



Staff Report

PLANNING DIVISION

DEPARTMENT of COMMUNITY and NEIGHBORHOODS

To: Salt Lake City Planning Commission
From: Krissy Gilmore, Senior Planner, Kristina.Gilmore@slcgov.com , 801-535-7780
Date: December 14, 2022
Re: PLNPCM2022-00687 Northpoint Small Area Plan

Small Area Plan

REQUEST:

A request by the City Council to revise and complete an update to the Northpoint Small Area Plan. The Northpoint Small Area Plan is a land use plan for the land that is generally located between the Salt Lake City International Airport and the northern boundary of the city along the 2200 West corridor. The Northpoint Small Area Plan was adopted in April 2000. The update of the plan was funded by the City Council to provide guidance on existing and anticipated development in the area, as well as annexation-related issues. As part of the plan update, the Salt Lake City Major Streets Plan will be amended to reflect recommended roadway alignments.

RECOMMENDATION:

Based on the information and findings in this staff report, staff recommends that the Planning Commission accept public comment and make a positive recommendation to the City Council to adopt the *Northpoint Small Area Plan* and amend the *Salt Lake City Major Streets Plan*, PLNPCM2022-00687.

ATTACHMENTS:

- A. [ATTACHMENT A: Northpoint Small Area Plan](#)
- B. [ATTACHMENT B: Major Street Plan Amended Map](#)
- C. [ATTACHMENT C: Public Comments Received Since October 26, 2022 Public Hearing](#)

PLANNING COMMISSION PUBLIC HEARING

On October 26, 2022, the Planning Commission held a public hearing regarding the Northpoint Small Area Plan and Major Streets Plan Amendment. Since that date, Planning Staff conducted additional public outreach, including a meeting with the Westpointe Community Council, and revised the plan to address the direction received by the Planning Commission. The intent of this report is to go over revisions made to the plan since the Planning Commission public hearing and discuss key issues

identified during public engagement. Please see the prior [staff report](#) for the project background and a full summary of the draft plan.

PLAN REVISIONS

At the public hearing held on October 26, 2022, the Planning Commission tabled the plan and provided direction to Planning Staff to allow more time for public comment and to consider revising the size of the wetland buffers. The Planning Commission also discussed how the suggested changes to the M-1 zone would be applied and if it would be appropriate to amend the M-1 city-wide. In response to the comments and provided direction from the Planning Commission and public input, the following key changes to the draft plan were made:

1. Page 16: Added the following language to the Vision Map to better define wetland areas:

**Wetlands include both jurisdictional and non-jurisdictional wetlands. The Vision Map is intended as a general guide for wetland areas, but specific wetland delineation should be done when land is developed. Identification of wetlands primarily involves the determination of three factors: the predominance of wetland vegetation, hydric (wetland) soils, and signs of hydrology.*

Planning Staff confirmed with the Salt Lake City Department of Public Utilities that the buffers would apply to both jurisdictional and non-jurisdictional wetlands. Jurisdictional wetlands are wetlands that are delineated by an experienced professional and determined to be under the regulatory authority of the Army Corp of Engineers (or other federal or state agencies). These are generally wetlands that are connected to Waters of the United States (WUS). Non-jurisdictional wetlands are essentially everything else that meets the definition above. There are very valuable wetlands that have ecological, riparian, or other values that are not under the Army Corp regulation and should be included in any buffer setbacks.

2. Page 18: Revised the language to the setbacks and buffer table to clarify the intent of those setbacks and buffers. It's important to note, as mentioned in the plan, the specific details for each buffer will be determined when the setback is adopted into code. Additionally, the language was also changed from "must" to "should" since the implementation language and timeline has yet to be determined.
3. Page 32: Added language to the "Evaluate the Feasibility of Acquiring Sensitive Lands" action item to state that land adjacent to the Jordan River should be a high priority for preservation.
4. Page 33: Added language to support a Northpoint-specific development code as the preferred implementation path. This was added after comments from the Planning Commission led staff to realize that while some modifications to the M-1 or BP zones are appropriate city-wide, many of the changes proposed are location specific to the Northpoint Area. A Northpoint-specific zone would likely be a modified M-1 zone better suited to include the specific Design Standards recommended in the document. Language was also added to clarify that the vision is directed toward manufacturing-centric jobs rather than large distribution or logistical centers. The new language includes:

The preferred approach to implement the vision for the Plan Area is a Northpoint-specific development code. A Northpoint-specific code should include:

- *Adopting the Design Standards from Chapter 2 of this document, which includes the recommended setbacks and buffer areas, landscape requirements, building materials, and design standards, etc.*

- *A modified list of permitted and conditional uses to promote manufacturing and office uses while limiting distribution-focused uses.*
- *Incentive-based tools for preserving open and sensitive lands, such as allowing an increase in the maximum building façade length if preserving a larger amount of open space or buffer area than required.*

Removed the recommendation, “Consider conditional uses (rather than permitted) for potential environmental hazards, such as fertilized turf fields.” This was removed following direction from the Planning Commission and review by staff. The intent of this action item is covered in other plan goals, such as updating landscaping requirements and developing environmental impact standards.

Additionally, on page 33, specific implementation actions were added for the wetland buffer and canals/drains buffers:

- *Amend the Riparian Corridor Overlay zone to include wetland protection buffers.*
- *Amend the Lowland Conservancy Overlay zone to include canals and drains in the Plan Area.*

5. Page 35: Revised the wetland buffer action item to better guide staff in updating the zoning code. To address the direction provided by the Planning Commission, Staff conducted research on acceptable wetland buffer widths, as well as met with the Salt Lake City Department of Public Utilities to discuss the best path forward. We concluded that it is somewhat difficult to quantify the exact width of what an appropriate buffer should be and that it largely depends on the goal of the buffer. If the goal is wildlife habitat and ecological preservation, then the larger buffer the better, and 200 feet is appropriate. However, in some situations, a smaller buffer width (with adequate vegetation) could be appropriate. The language was updated to include the potential for applying the appropriate buffer based on the function of the wetland. Additional flexibility could be applied to the buffer width if mitigation measures, such as revegetation, occur. This framework is based on example ordinances from other cities with complex wetland management. Updated language includes:

The Great Salt Lake is a complex and delicate ecosystem and impact to this habitat area by new development should be carefully mitigated. A critical part of this mitigation is ensuring there is an adequate buffer between development and the wetland/upland ecosystem. The Plan identifies up to a 200 foot buffer from wetland areas. This should be implemented through either an update to the City’s existing Riparian Overlay Zone or a new Northpoint specific development code.

In developing the updated code, the city should consider identifying priority wetland areas and applying the maximum buffer to the highest priority wetlands. Reduced buffer widths may be appropriate based on the condition, function, and goal of the specific wetland buffer. Additionally, the city should allow flexibility of wetland buffers through incentive based tools. For example, the buffer width could be reduced through mitigation measures that include native vegetation restoration.

Of note, there are many public comments regarding the wetland buffer widths and that they are either too restrictive or not restrictive enough. Additionally, comments have included concern that the draft plan does not contain enough detail on how the buffers would be applied in the zoning. The above framework is proposed as a guide for future zoning and specific details will be developed when the zoning is updated. Planning Staff will continue to work with the Salt Lake City Department of Public Utilities when the zoning is developed. Additionally, any zoning proposal would include a public input and review process.

Public Input and Key Considerations

Through public input, several key issues were highlighted regarding the current draft plan:

1. Why Transition from Agricultural and Rural Residential to Light Industrial?
2. Transition Area Adjacent to the Jordan River
3. Vision to Limit Distribution Uses
4. Maximum Street Frontage

1. Why Transition from Agricultural and Rural Residential to Light Industrial?

A clear theme from public engagement has been a concern with why the draft plan contemplates a change from agriculture/rural residential to light industrial.

First, for context, a 2019 annexation petition, as well as several privately initiated rezone petitions and inquiries, spurred the update to this plan. When an area is continuously seeing development inquiries and rezone petitions, it signals that the existing zoning and area plan should be re-evaluated. The City Council recognized this need and initiated a plan update to look at a change from the existing agricultural zoning. While transitioning away from agriculture is not the goal of the City, and there are no plans to actively rezone any properties, many agricultural property owners in the Northpoint area wish to transition to another land use. This is clear from the development inquiries to the city, including a new annexation petition, but also from public comments received both in writing and through in-person public meetings.

During public input, it was expressed that some would prefer to see the area as residential instead of light industrial or business park zoning. New residential in this area is not appropriate for a number of reasons, primarily because of the proximity to the airport and land use conflicts between residential uses and already approved industrial areas. The Airport Master Plan illustrates a significant build out of the airport and when this is accomplished, this area will experience a significant increase in airport noise and air traffic. Northpoint is directly north of the east runway (RW 17/35). This runway has been referred to as the “general aviation” runway because most of its use has been from smaller non-commercial aircraft. As the airport continues to grow, more and more commercial flights will depart from this runway. To achieve its maximum capacity, the current Airport Master Plan recommends this runway be lengthened. These modifications will lower the altitude of aircraft over the Northpoint community resulting in more frequent noise exposure. If new residential is permitted in the plan area it limits the airports’ ability to grow and hurts the overall economy of the city and state.

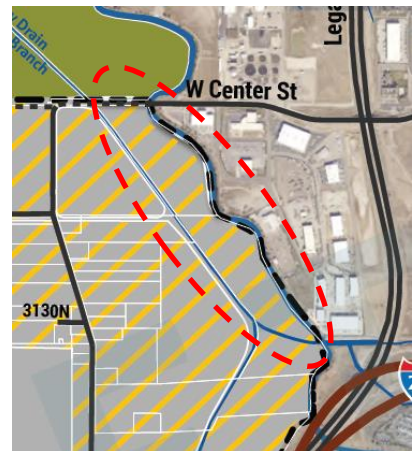
Planning Staff believes that light industrial and business park zoning is the next logical land use for the area. The Northpoint area is located close to transportation networks making it an ideal development location for both light industrial development and employment. The economic market study provided

by Zions Bank Public Finance supports that the area can support light industrial development and identified that there is a demand for it. In addition, the already approved ~430 acre/20 lot Scannell-Swaner Subdivision will put even more pressure on the area to transition away from agriculture and residential uses due to the visual impact and traffic associated with the development.

Staff acknowledges that there isn't a general consensus for transitioning this area into light industrial. With that said, for the number of reasons stated throughout this key consideration, we believe that the best scenario is that the plan sets up a realistic framework for how to move forward – acknowledging the likely outcome of light industrial while setting up a framework to preserve some open space through incentive-based tools.

2. Transition Area Adjacent to the Jordan River

The public and Planning Commission expressed concern that the area adjacent to the Jordan River is not shown on the Vision Map as open space. As previously mentioned, this area was originally shown as open space on the vision map and the designation was later changed to the Transition land use category. This was changed because designating large or entire portions of private property as open space is a significant economic taking risk. This risk was identified by the Attorney's Office and staff appropriately responded. The city acknowledges the importance of open space; however, taking development potential away from a private property owner is a serious and impactful direction for the city. It is known that the area in question is under significant development pressure. The city is already processing an annexation petition for the northeast section of the project area, including land adjacent to the Jordan River, asking for light industrial. While it would be visionary to show the area as open space, it is very likely to transition to light industrial given the current annexation petition.



There were comments provided that identifying an area as open space on a vision map doesn't necessarily require open space as the future zoning for that property. This is in part correct because the small area plan establishes the framework for future zoning. With that said, the two shouldn't contradict one another. The vision map should anticipate the future zoning and use of the properties within the boundary. Additionally, the city would be in a delicate position if the small area plan designated this area as open space and then, shortly after has to process annexation petitions for light industrial zoning.

The intent of the plan is to acknowledge this reality and to establish opportunities to preserve open space. These include a 100' buffer from the Jordan River (already in place in the Riparian Overlay Zone) and a 75' buffer from the canal (new recommendation/current buffer is 50'). The plan also recommends a Northpoint-specific zone that would set up incentive-based tools for open space preservation. The tools identified include flexibility in the building footprint when clustering or modifying the maximum building length along 2200 West, which would be in exchange for an increased open space buffer.

Additionally, other preservation tools could be used if the city would like to purchase the property as city-owned open space, or by other means, such as by purchase or transfer of development rights. However, these tools are significantly harder to implement and would be more time intensive than updating the development code.

3. Vision to Limit Distribution Uses

The draft plan was updated to clarify that light industrial in the project area should be primarily comprised of manufacturing uses and should limit distribution/logistical-focused uses. Several public comments have been received with concern regarding this addition to the draft plan and that it would severely limit the build-out of the area. As mentioned in this report, development in the area is constrained – residential is not supported due to proximity to the airport and heavy manufacturing would not be supported due to impacts on the environment. Due to the unique location of the project area, light manufacturing is the next logical land use. However, the City Council representative for this area has provided policy direction that the M-1 (Light Manufacturing) permitted and conditional land uses should be refined to limit distribution uses to ensure that if the area develops, it is for high-quality jobs and land uses that will be less impactful to existing residents.

4. Maximum Street Frontage

Planning Staff has received public comment with concern regarding the recommended maximum building length along a public street (400 feet and 250 feet depending on land use). This maximum building length was included in the plan to mitigate the impacts of large development on existing residential and agricultural properties, as well as to promote a development pattern that includes a mix of building types and uses. To address concerns, the updated plan recommends developing the zoning to allow an increased building frontage in exchange for a larger amount of open space. Staff does not recommend increasing or removing the maximum building length.

Public Comment and Revisions in Response

Since the most recent draft was distributed in mid-November, several public comments have been received by Planning Staff. Many of which staff recommend inclusion into the draft plan sent to the City Council:

- Page 16: “The Plan Area...is nestled between wetland spillover from the Great Salt Lake...”
 - o Delete the word “spillover” as it implies excess, wasted, low value, and is not an ecological term.
- Page 24: Add "and other contrast mitigation building and landscape features" to the sentence addressing building color and materials. While colors that blend in with the natural surroundings are essential, there may be additional contrast mitigation techniques that are necessary and appropriate in specific areas such as the land close to 3200 West.
- Page 32: Evaluate the Feasibility of Acquiring Sensitive Lands as City-Owned Open Space
 - o In addition to lands adjacent to the Jordan River mentioned in the text, open land and wetlands along 3200 W should also be listed as an area for priority open space preservation.
- Include the notation on the vision map regarding wetland applicability (jurisdictional and non-jurisdictional) on page 35 as well.

STAFF RECOMMENDATION

Planning staff recommends that the Planning Commission accept public comments and make a recommendation to the City Council to adopt the Northpoint Small Area Plan.

NEXT STEPS

After the Planning Commission makes a recommendation to the City Council the small area plan will continue to the City Council for a final determination on the adoption of the Northpoint Small Area Plan.

ATTACHMENT A: Northpoint Small Area Plan

NORTHPOINT

Small Area Plan

Salt Lake City
Adoption Draft, November 2022



LOGAN SIMPSON

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CHAPTER 1

INTRODUCTION

Introduction Overview

Location

The Northpoint Plan Area is located just north of Downtown Salt Lake City, near Farmington Bay and the Great Salt Lake. The Plan Area is bounded to the east by Interstate 215 and is comprised of mainly agricultural, industrial and residential uses.

Northpoint lies within the northwest quadrant of Salt Lake City, adjacent to vital environmental resources including the Jordan River and playas and wetlands associated with the Great Salt Lake. Over half of the property in Northpoint is currently under the jurisdiction of Salt Lake County and consists of agricultural uses, business park development, industrial and commercial zoning. Environmental considerations greatly influence the future growth and development of the area.

Directly south of Northpoint is Salt Lake City International Airport, which provides opportunities for and constraints to the potential development within Northpoint. The airport continues to expand through ongoing renovations and is currently being guided by the [2022 Salt Lake International Airport Master Plan](#). Its proximity is a defining factor of the Plan Area.

Northpoint is also adjacent to several recreational areas including the Wasatch Mountain Range, with its many trails, the Jordan River OHV State Recreation Area, and the Salt Lake City Regional Athletic Complex.



Graphic 1.1 | Northpoint Plan Area

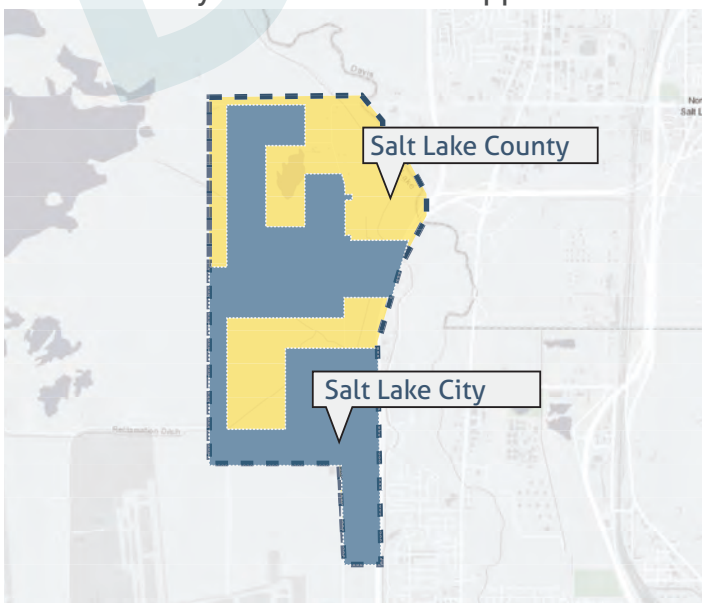
Plan Context and Purpose

In 2000, a Northpoint Small Area Plan was adopted with goals to eliminate potential land use conflicts between the Salt Lake International Airport, future development, and the existing agricultural lifestyle. Other notable planning efforts for this region include the 1992 Northwest and the Jordan River/Airport Plan which address the Northpoint Plan Area, the Great Salt Lake wetlands and Jordan River, the Salt Lake Airport, and surrounding land; the 2020 Blueprint Jordan River Plan which illustrates a cohesive vision for the River as it stretches through multiple jurisdictions; the *2021 Salt Lake City International Airport Master Plan*; and the *2021 Salt Lake County West General Plan*.

The northwest portion of Salt Lake City is limited by multiple layers of constraints, mostly environmental, but also due to airport activity, connectivity, and social equity issues. It is one of the largest growth areas for the City, but quite possibly, the most difficult to develop. This Plan addresses the natural environment, built environment, and community attributes. Many factors contribute to constraints facing the area, however many attributes act as opportunities.

The Northpoint Small Area Plan Update is a response to the rapid pace of growth and change in the northwest portion of Salt Lake City and the anticipated new business park and light industrial uses in the area. The key goals of this Plan are to:

- » Identify appropriate future land use and development characteristics for the area that can coexist with the wildlife habitat and natural environment of the Great Salt Lake, and the operations of the Salt Lake City International Airport.
- » Update future annexation potential for unincorporated land within Salt Lake County.
- » Identify appropriate infrastructure requirements, including utilities and roadways, to support the future land use in the area.
- » Identify appropriate buffering, building design, and development characteristics to reduce the impacts to residential and agricultural uses, important wildlife habitat, and other uses within the plan area.
- » Recommend methods to reduce the negative impacts that future land uses may have on air quality, water quality, noise, and light.



Graphic 1.2 | Northpoint Jurisdictions

Introduction

Guide to This Plan

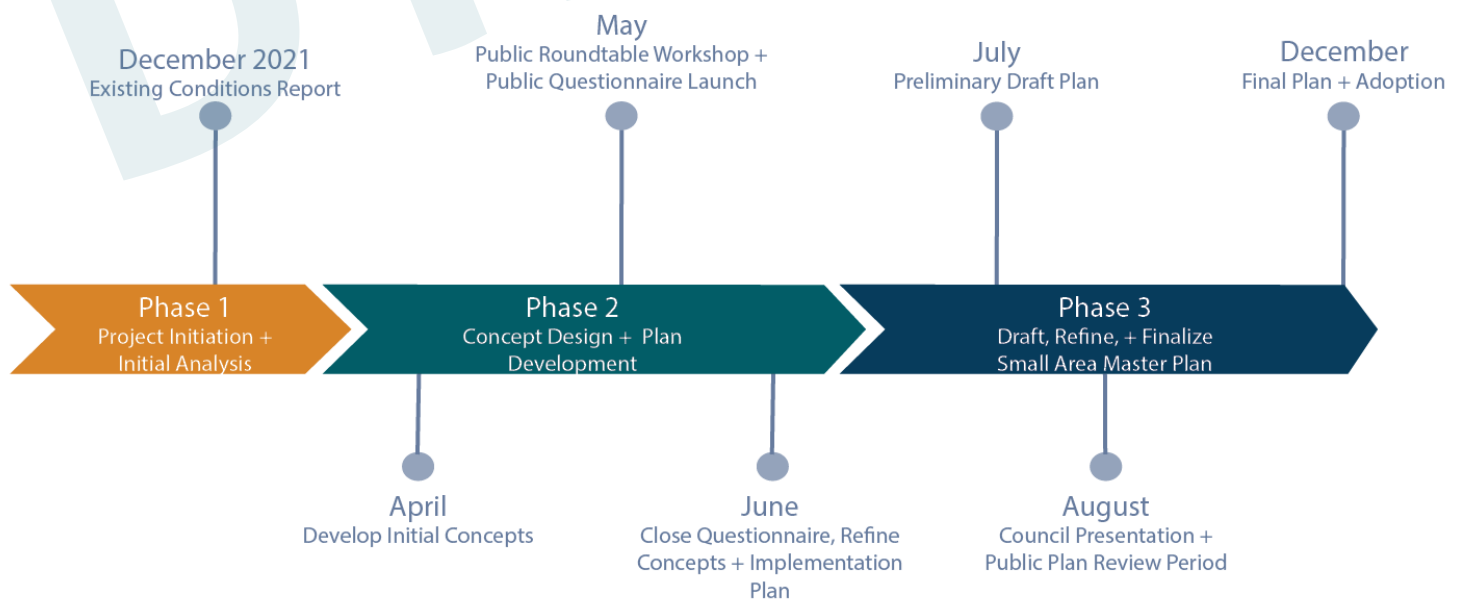
This document is intended to support Salt Lake City's overarching vision established in Plan Salt Lake while also providing tailored tools to help the Plan Area grow appropriately. Once the Northpoint Small Area Plan is adopted, its supplemental recommendations will guide applicants to develop within the scope of the Community's Vision. This plan should be referenced when discretionary land use decisions are being made. These recommendations include, design standards, land acquisition tools, regulatory tools, and incentive based tools.

Master plans detail the vision, policy, and framework of the community that will guide growth and development over time. As the plan area transitions from greenfield and rural residential to industrial and business park, this plan outlines specific design standards and action steps the City can implement to mitigate the impact of new development on the surrounding natural habitat and existing residential properties.



Public Process

This planning process included one-on-one interviews with residents, developers, environmental groups, and City and county staff, a public open house, two public questionnaires, and a property owner-specific questionnaire. With several applications active in the Plan Area at the time this project started, it became apparent early on that habitat preservation and residential quality of life were primary concerns. This shaped the Plan, shifting focus from land use recommendations to tools available to the City to preserve habitat, mitigate impacts of new development on residents, water and air quality, and wildlife, and determine appropriate improvements to existing infrastructure.



Executive Summary

The Northpoint Small Area Plan is a detailed master plan for the Northwestern Community of Salt Lake City. The Plan Area contains large amounts of underdeveloped land, nestled between wetland spillover from the Great Salt Lake to the west and urban growth to the east. Additionally, parts of the Plan Area are fragmented with unincorporated County land and airport-owned property. A clear plan is needed to address the development pressures in the Plan Area, which continue to increase despite natural constraints. The Northpoint Small Area Plan aims to guide future development based on the previously adopted community plans and future land uses that the City has identified as appropriate to the area. While many property owners intend to retain their property as agricultural land, redevelopment and new development is anticipated to be primarily light industrial and manufacturing. The Plan contains three elements to guide growth into the future:

Vision Map

The Northpoint area has experienced growth that can conflict; industrial development adjacent to agriculture and residential uses, and developments adjacent to or abutting critical habitat areas (i.e. wetlands and upland). Industrial development has begun, and is expected to continue, to creep into this area of Salt Lake City. Understanding this reality, ***the Northpoint Vision is to balance the anticipated growth of light industrial and manufacturing uses with the existing and continued residential and agricultural uses of the area.*** This will be accomplished through outlining mitigation strategies for high-impact development directed at preserving quality of life for residents and the natural environment.

Design Standards

The design standards are directly connected to the anticipated future development in the area. Building and site design have the ability to affect built environments in impactful ways. When applied with a clear vision in mind, design standards can shape development that reduces visual and physical land use conflicts. The standards touch on each land use designation and provide clear direction as to how the area should be built. Although the standards are separately outlined in the plan, they are implied to be implemented with the other action items.

Implementation

What separates the plan from a design standards manual, is the comprehensive action items that are addressed in the implementation chapter. The action items range from strategies to best preserve open space and critical habitats, recommends further study for service and infrastructure needs, annexation of unincorporated properties within the Plan Area, and funding tools that will help the Plan Area grow responsibly. These elements can be applied to the area as a whole and provide different initiatives aside from traditional zoning regulation guidance. There are three action items identified as “critical path”, being the most critical to complete once this plan is adopted. These action items are:

- » **Services and Infrastructure** | Evaluate Funding Solutions to Redesign 2200 W and Construct 2900 W
- » **Built Environment and Design** | Adopt Development Code Updates and Codify the Design Standards Herein
- » **Natural Environment and Preservation** | Evaluate the Feasibility of Acquiring Sensitive Lands as City-Owned Open Space

Goals of this Plan

- » Identify appropriate future land use and development characteristics for the area that can coexist with the wildlife habitat and natural environment of the Great Salt Lake, and the operations of the Salt Lake City International Airport.
- » Update future annexation potential for unincorporated land within Salt Lake County.
- » Identify appropriate infrastructure requirements, including utilities and roadways, to support the future land use in the area.
- » Identify appropriate buffering, building design, and development characteristics to reduce the impacts to residential and agricultural uses, important wildlife habitat, and other uses within the corridor.
- » Recommend methods to reduce the negative impacts that future land uses may have on air quality, water quality, noise, and light.

How Will We Get There?

Vision Map Categories

See more on page 16



NATURAL OPEN SPACE

Areas where development is limited to passive recreational amenities

TRANSITIONAL

Areas that are currently residential. New development will be subject to impact mitigation measures

BUSINESS PARK/INDUSTRIAL

Areas anticipated to develop as Business Park and Light Industrial

AIRPORT

Areas owned by the Salt Lake City International Airport

Key Design Standards

See more on page 20



Limit maximum building frontage along 2200 W

Maintain buffers between new development and existing wetlands, canals, drains, and the Jordan River

Maintain a 65-foot buffer between new development and existing residential

Allow clustering of buildings to maximize buffers

Emphasize appropriate building materials and encourage native landscaping

Critical Implementation

See more on page 32



Services and Infrastructure

Evaluate funding solutions to redesign 2200 W and construct 2900 W

Built Environment and Design

Create a Northpoint specific development code and codify the Design Standards

Natural Environment/Preservation

Evaluate the feasibility of acquiring sensitive lands as city-owned open space





CHAPTER 2

THE VISION

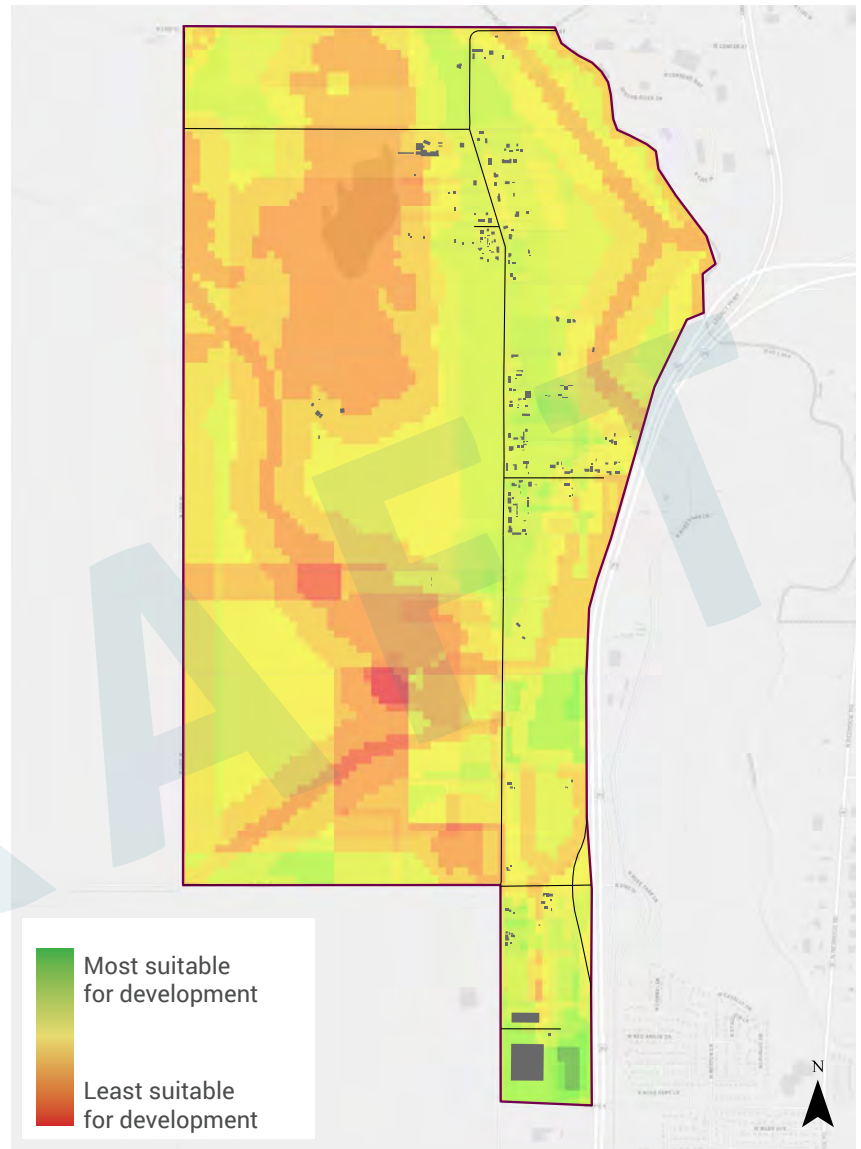
The Northpoint Vision Overview

Constraints to the Vision

As discussed in Chapter 1, the Plan Area consists of several development constraints ranging from sensitive wetland habitat to airport influence zone regulations. Mapping these constraints is a crucial first step in determining the areas most suitable for new development and identifying areas that should be preserved as habitat and open space. The Constraints Map illustrates the results of this analysis and may be used to prioritize sensitive lands for preservation or acquisition. For a detailed analysis of development constraints and opportunities used in this analysis, see Appendix C. Constraints reviewed in this analysis included:

- » Designated Wetlands
- » Salt Lake City International Airport-Owned Properties
- » Utility and Open Space Easements
- » Airport Influence Zones (A, B, C)
- » Viable Agriculture
- » Airport Noise Contours

NORTHPOINT CONSTRAINTS MAP



Using the Vision Map and Design Standards

Graphic 2.1 | Constraints Analysis for Northpoint

The Vision Map in this chapter is intended to show where additional standards are necessary to ensure future development is compatible with existing residential, agricultural, and sensitive habitats.

To use this chapter, review the Vision Map and accompanying Design Standards. It is intended that the following design standards be incorporated into Salt Lake City Zoning and Development Code to apply to new development in the Plan Area.

Land Use Categories

Natural Open Space

Purpose: Natural Open Space areas are those that should be preserved as natural open space and prohibit development. The Natural Open Space district aims to connect critical habitats in the least fragmented way possible considering development trends in the Plan Area.

Applicability: These areas include designated wetlands, uplands, existing recreational amenities, and areas connecting them. All designated wetlands, uplands, and other sensitive lands fall under the Natural Open Space district.

Use Standards: Development in these areas should be limited to passive recreational opportunities, trailheads, and small parking areas to serve recreational uses. Adjacent land uses will be subject to mitigation.

Transitional

Purpose: The purpose of this zone is to mitigate the impacts of Business Park/Industrial development on residential properties.

Applicability: New development is anticipated to be primarily light industrial with a focus on manufacturing centric land uses. There are no properties in the Plan Area that are identified for new residential development.

Use Standards: Residential properties shall be subject to natural habitat impact mitigation standards such as buffering critical areas from all development. Should any residential properties transition to BP/Industrial, all BP/Industrial standards will apply.

Business Park/Industrial

Purpose: Business and light industrial development is anticipated in the Plan Area. The majority of the Plan Area will convert to light industrial, manufacturing, or business properties.

Applicability: The BP/I district applies to properties that do not contain significant constraints such as wetlands, uplands, existing residential, or other major limitations.

Use Standards: Development in these areas will be reviewed closely for impact to existing residents and sensitive lands and may require additional mitigation designs focused on protecting the natural environment and quality of life of existing residents.

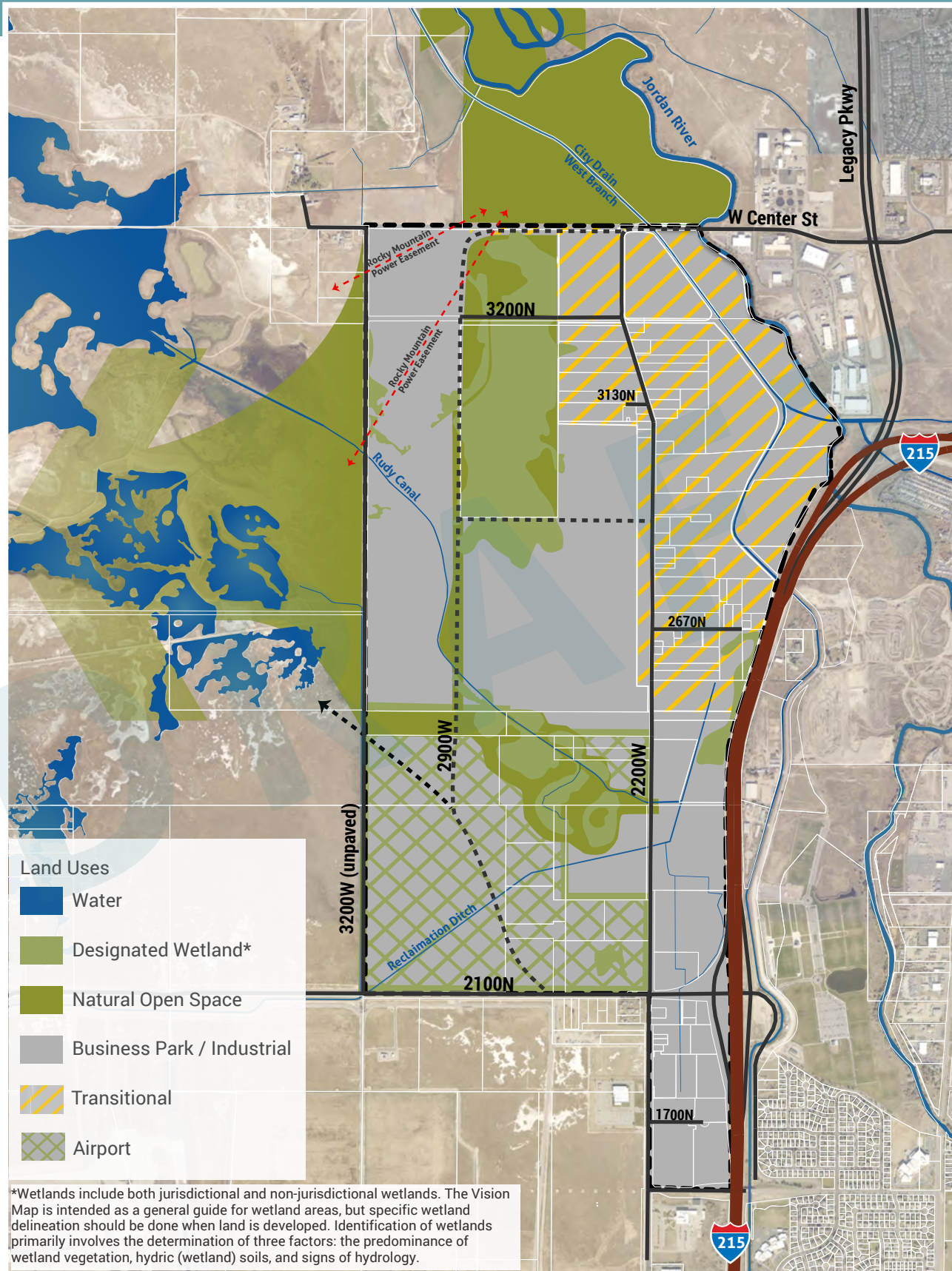
Airport

Purpose: These areas are owned by the Salt Lake International Airport, though there are no plans currently to develop these areas.

Applicability: The Airport district applies to properties that are owned by the Salt Lake International Airport.

Use Standards: Development in these areas should be limited to passive recreational opportunities, natural open space, and utility and infrastructure needed for the Salt Lake International Airport.

NORTHPOINT VISION MAP



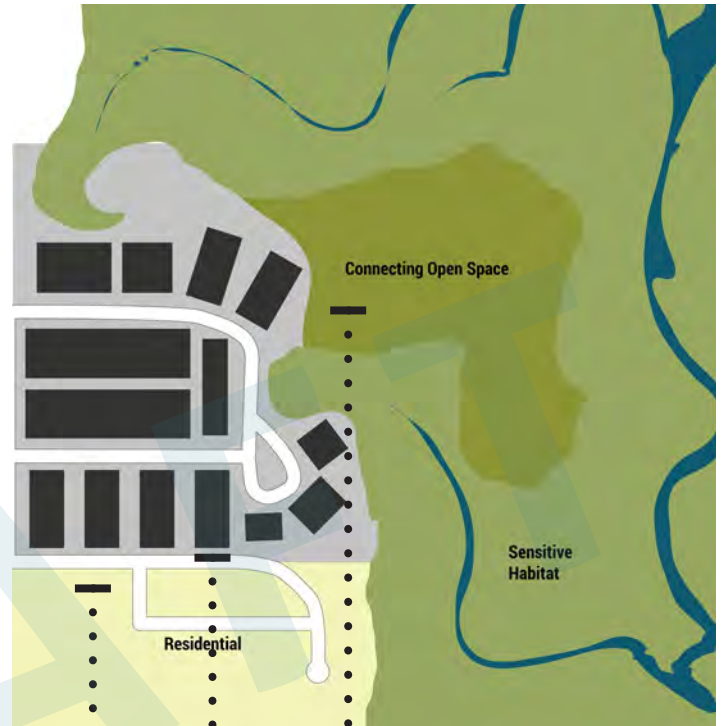
Graphic 2.2 | Northpoint Vision Map

Without Design Standards



- Minimum lot sizes and open space requirements force buildings to be oriented in an inefficient way, taking up more native land than needed.
- Typical industrial development styles can disturb natural habitat with disruptive materials, lighting, hazardous landscaping and fencing, etc.
- No restrictions on building size near/facing existing residential.

With Design Standards



- Allow clustering of buildings in favor of preserving connected habitat and critical open space.
- Greater attention to building design (i.e. building materials, lighting, landscaping, etc.).
- Smaller buildings facing existing residential and major roadways, largest buildings in the middle of development.

Design Standards

Setbacks and Buffers

Buffers and setbacks are intended to reduce the adverse impacts of adjacent land uses and provide important habitats for wildlife that utilize buffer areas. While setbacks shown in this document are intended to extend from the natural feature (i.e., designated wetland or canal) to any impervious built surface of new development (i.e., sidewalks, parking lots), specific details will be determined when the setback is adopted into code. Setbacks from natural features may include landscaping and stormwater management.

Required setbacks for new development adjacent to existing residential are intended to extend from new structure to existing residential structure(s). Setbacks from residential structures may include sidewalks, parking lots, etc.

A maximum building length along 2200 West is recommended to reduce the impact of large-scale industrial development on longstanding agricultural and residential uses, as well as maintain habitat connections.

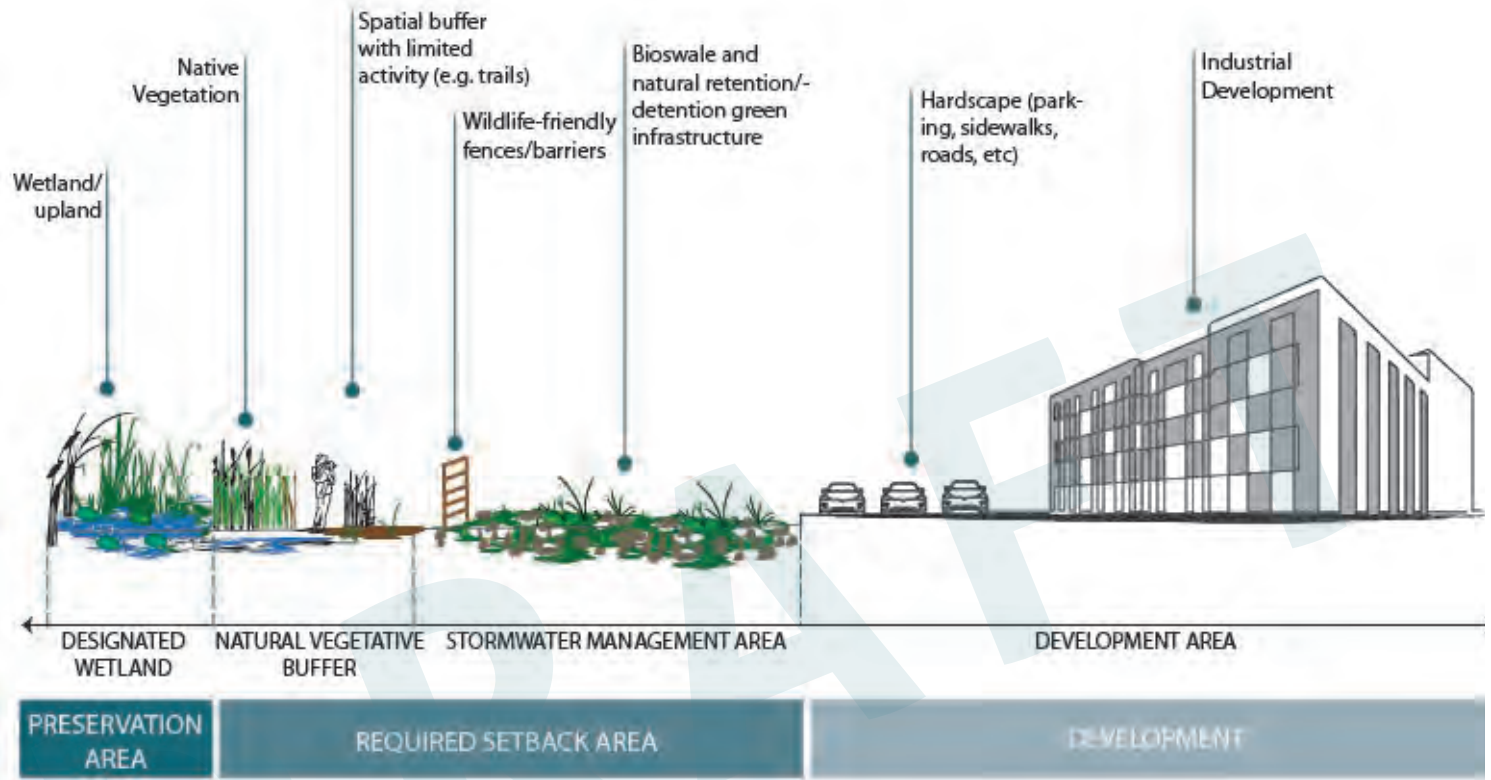
Smaller setbacks in the transition area are intended to allow flexibility for residential development under the existing zoning. As development intensity increases with the development of business park or light industrial land uses, the greater setbacks apply.

	Land Use	
	Business Park/ Industrial	Transitional
Minimum Setback of New Development		
Designated Wetlands	up to 200 ft _{1,2}	75 ft _{1,2}
Canals and Drains	75 ft	75 ft
Jordan River	100 ft _{1,2}	75 ft _{1,2}
Existing Residential	65 ft	65 ft
Maximum Continuous Building Frontage on 2200 W	400 ft	250 ft

1 | Should preserve uninterrupted connection between wetlands and uplands

2 | Should include and maintain a planted stormwater mitigation element such as a bioswale

Preferred Buffer for Development Adjacent to Wetlands/Uplands



* When buffer is applied during development of a property the City must consider the potential for a regulatory taking of property.

Design Standards

Standards for All New Development

1 | Habitat Mitigation Standards

1.1 | Grading Limitations

Considering limitations to grading can help minimize impacts to native vegetation. It is important for only areas planned for development to be cleared and graded as it can allow for natural drainage courses to be maintained and reduces the need to manage stormwater flows.

- ◇ Soil cover or ramps shall be included to allow for movement of wildlife through the drainages.
- ◇ Excavation methods such as installation of underdrains should be considered.
- ◇ Vertical drop structures and concrete lined channels should be avoided.
- ◇ Use of large angular rip-rap for erosion control should be limited.
- ◇ Non-structural features that also provide riparian habitat should be considered.
- ◇ Where possible, development should relate the building to the natural site by stepping buildings and avoiding mass leveling of the site.

1.2 | Fencing and Walls

Fences and walls can be barriers to wildlife and impede the movement of wildlife between habitat areas. Although fencing can be used to exclude wildlife, it should be applied in very specific areas that do not restrict larger wildlife movement and migration patterns or access to food, water, shelter, or potential mates.

- ◇ Fencing shall be permeable to allow for the safe passage of animals and facilitate wildlife movement through existing or constructed wildlife corridors.
- ◇ Natural barriers for privacy purposes shall consist of natural materials where possible, such as boulders, densely-planted vegetation, or rip-rap.
- ◇ Decorative fencing features that could be hazardous to wildlife shall be prohibited including:
 - » Pointed or narrow extensions at the top of fences.
 - » Wires that may entangle animals.
 - » Hollow fence posts that are open at the top when birds or other small animals may become entrapped in an open cavity.



Graphic 2.3 | Native Landscaping

1.3 | Dark Sky Lighting

Lighting is an important element in built environments that allows for a perceived sense of safety at night. However, without appropriate design and placement, outdoor light fixtures can sometimes be inefficient. Outdoor lighting in the Plan Area should be designed in a way that benefits the built environment without negatively impacting the natural environment. Artificial lighting can disrupt wildlife's natural patterns and behaviors.

- ◇ Light fixtures shall be selectively placed and fully shielded (i.e. light shall only be emitted downward and not above an imaginary horizontal plane passing through the light source).
- ◇ Lights shall be directed away from natural areas.
- ◇ Lighting shall use timers to automatically turnoff outside of hours of operation.
- ◇ Outdoor lighting shall be a color temperature of 3,000 kelvin or less.
- ◇ Lighting in non-functional spaces is prohibited (i.e. architectural and landscape lighting is not necessary for function of built environments).
- ◇ Light fixtures with motion or heat sensor may be used to keep lights off when lighting is not required.
- ◇ Lighting should consist of International Dark Sky Association (IDA) approved fixtures.
- ◇ Electronic message centers (EMC) shall be switched off completely after 11pm (or 30 minutes after the close of business for on-premises signs, whichever is later), and remain off until one hour before sunrise.
 - ◇ EMCs applications for traffic and safety information shall be exempt from curfew.



Graphic 2.4 | Dark Sky Friendly Lighting

Design Standards

2 | Water Conscious Development

2.1 | Landscaping

Regulating native species in landscape design can lead to low-maintenance and water-wise environments that reflect the natural environment in the built environment. Additionally, habitat value can be increased when landscaping isn't overly manicured. However, weeds and invasive species should be controlled so that they do not compete with native species for necessary water and nutrients.

- ◇ Landscaped areas shall follow Low Impact Development (LID) principles.
- ◇ Landscaping shall consist of native, adaptive, and drought-tolerant plantings.
- ◇ New construction shall follow the Salt Lake City Tree Protection and Preservation Policy.
- ◇ Landscaping shall not require modifications to the native soil.
- ◇ Minimize irrigated landscape areas and utilize naturalized swales.
- ◇ Fertilizers and herbicides shall be prohibited.
- ◇ Development adjacent to wetlands and uplands shall adhere to the buffer requirements herein and include on-site stormwater management.

2.2 | Stormwater Management

As undeveloped land becomes developed with hard surface materials, loss of permeable surfaces will have a direct effect on stormwater runoff. It is essential to avoid stormwater contact with industrial materials and activities and to avoid point-source pollution and degradation of the wetlands, uplands, and other natural habitat. There are comprehensive best management practice guides that can help applicant navigate the best solution for the specific use.

- ◇ Significant new development resulting in a change of land use shall include environmental impact mitigation measures and align them with current executive orders and master plans.
- ◇ Embankments and spillways shall be designed and approved by engineers that specialize in stormwater management and ecologically friendly design.
- ◇ Stormwater systems shall not diminish water flow to wetlands.
- ◇ Sedimentation systems may be used.
 - » Sediment systems are more efficient with pollutants associated with metals, organic compounds, and other oxygen-demanding substances. There are limitations with sediment systems as small particles do not always settle therefore the substances in the industrial stormwater discharge should be evaluated prior to implementation.
- ◇ Detention ponds may be utilized with an underdrain to outlet to allow water to slowly release into proper stormwater systems.
- ◇ Retention ponds may be utilized to regularly contain water on site and via infiltration.
- ◇ Infiltration systems may be utilized to capture and infiltrate runoff in order to reduce runoff volume.
 - » i.e. Infiltration Trenches, basins, bio-retention systems and underground infiltration tanks.



Graphic 2.5 | Stormwater Runoff Design



Graphic 2.6 | Bioswale



Graphic 2.7 | Bioswale



Graphic 2.8 | Native Landscaping



Graphic 2.9 | Porous Surface Street Edge

3 | Airport Conflict Mitigation

Aviation adjacent to the Plan Area has been around for many years. Similarly to the rest of Salt Lake Valley, the Airport, too, has grown and anticipates further growth into the future. It is important to account for current and future impacts.

3.1 | Noise

Regulation programs like Federal Aviation Regulation (FAR) Part 150 Noise, should be implemented on airport owned properties as to mitigate the impacts of noise. This program was established by the Aviation Safety and Noise Abatement Act of 1979 and sets forth the measure that a specific airport operator has taken to reduce the impacts of noise.

3.2 | Land Use Compatibility

Local land use planning such as this plan can better prepare for the implications of planning around airports, and other airport-related development. Land use decisions around the airport properties should account for the impacts and determine whether the proposed use is appropriate. This can be hindered when multiple jurisdictions regulate the surrounding lands, however, there are tools such as annexation to consolidate regulatory authority and ensure that only appropriate land use decisions are made.

4 | Visual Design

Conscious design can help enhance compatibility between various uses and ensure that development fits in with the surrounding natural environment as best as possible.

- ◇ Units (and open space required by code) shall be organized or “clustered” in an efficient manner on properties where doing so will allow for larger habitat buffers.
- ◇ Building frontages along 2200 W shall not exceed 400 ft in length.
- ◇ Uninterrupted horizontal expanses of 100 ft in length of any opaque material, including opaque glass, shall be prohibited on building frontages visible from public streets.
- ◇ Natural building materials and colors shall be included in the exterior of buildings to mitigate the contrast of the built and natural environment.
- ◇ Mirrored or highly reflective glass is prohibited.
- ◇ Mechanical systems/equipment shall be shielded with barriers such as foliage and fences.
- ◇ Common design elements shall be included in Business Park-zoned development.
 - » Designs should have a variety of unit sizes to accommodate different uses and the structural layout should also allow for flexibility.



Graphic 2.10 | Natural Design Elements



Graphic 2.11 | Natural Building Materials



Graphic 2.12 | Interior Courtyard

Standards for Transitional Areas

Development within Transitional Areas will be held to the standards previously mentioned with the following additional standards.

1 | Industrial Land Use Mitigation

As industrial developments increase in the Plan Area, it is essential to recognize the compatibility issues associated with industrial land uses and be able to mitigate issues through building and site design. Industrial developments intrinsically contain issues with noise, odor, dust, traffic, light, air quality, and visual/design elements, therefore mitigation is necessary.

1.1 | Noise

Industrial uses can have implications on noise that can affect adjacent land uses and also the natural environment. Noise can be classified into two different types: airborne and structure borne. Airborne is from the source to the receiver and can travel in all directions whereas structure-borne is vibrations through materials. Regardless of noise type, mitigation efforts should be in place prior, during, and after development. The following strategies are ways to mitigate the unwanted and unnecessary noise impacts due to industrial development.



Graphic 2.13 | Existing Residential in the Plan Area

- ◇ Noise impacts shall be mitigated by absorption, barriers, and/or damping.
 - » Absorption works towards dissipating airborne acoustic sound waves. The best sound-absorbing materials are acoustic foam, fabric panels, or underlayment. Common building materials do not absorb most sound whereas softer materials, such as carpet, foam padding, and fiberglass insulation are more efficient in dissipating noise.
 - » Physical barriers such as a berm or spatial separation that account for height, distance, thickness, and material type can contribute to the extent of mitigation.
 - » Damping reduces acoustic vibration within a structure or wall.
- ◇ Building masses such as U or L shaped forms are preferred as they can contribute to noise mitigation through spatial separation.
- ◇ Interior courtyards or garden spaces should be incorporated as they can be an effective noise mitigation strategy by providing quiet and light-filled spaces.
- ◇ Vegetation should be high and dense when used for noise mitigation for significant effectiveness.
- ◇ Air-conditioning units should be substituted for pressurized plenum space where possible. A plenum is a separate interior space provided for air circulation for heating, ventilation, and air-conditioning.

Design Standards

1.2 | Odor

Unlike other externalities of industrial uses, odor can be difficult to measure due to its subjective nature. However, there are some measures that can be taken to address the duration, frequency, intensity, and location of noxious odors.

- ◇ Mitigating odor should start at the source of the emitter, such as food operations, traffic emissions, chemical facilities, mechanical equipment pollution, and material handling. Operational and engineering best practices can mitigate odors prior to being released in the environment.
- ◇ If emissions cannot be prevented, various solutions can be applied such as:
 - » Plantings and trees to absorb and mask unpleasant smells as well as act as visual screening. Additionally, plantings can act as ozone generator which eliminates odorous substances through oxidation and are low maintenance. (Odor mitigation foliage include field maples, peace lily, serviceberry, sansevieria).
 - » Dispersion to reduce consolidated emissions. Dispersion can look like increased separation between odor source and receivers to allow for dilution or contain the dispersion in an enclosure to prevent odors dispersing.
 - » Location of open tanks and storage piles. Limit the presence of smells such as locating open tanks and storage piles away from residential and high-occupancy areas.
 - » Structure design elements. The operability and placement of windows and doors can also prevent intrusion of odors.

1.3 | Air Quality

Encouraging and supporting occupants that engage in sustainable processes and produce minimal emissions is the most effective way to mitigate air quality issues. In circumstances where this is unavoidable, exhausting air with ventilation can be effective and dilution can be used to mitigate the impacts ventilation can have on the surroundings.

- ◇ Apply in-room air cleaners and vegetation barriers to help mitigate localized air pollution.
- ◇ Use air filters and electronic air cleaners such as ionizers in duct-mounted and portable cleaners.
 - » i.e. activated carbon is an adsorbent media air filter.
- ◇ Green roofs may be incorporated to address on-site and off-site disturbances.
- ◇ Extensive venting should be used when possible.
- ◇ Operable windows should be used to provide direct ventilation where they do not conflict with noise mitigation strategies.



Graphic 2.14 | SLC Air Quality

1.4 | Traffic and Loading

Industrial development brings different vehicular traffic expectations. The challenge lies in balancing street level, building, and occupant needs. It is essential that industrial land uses contain loading and unloading infrastructure as the traffic associated with the use can have compatibility issues with adjacent non-industrial uses. Certain elements such as parking, loading bays, elevators, access points, noise, and aesthetic can have implications on the area. Establishing design standards can allow for the mitigation of incompatibilities between the movement of people, vehicles, and goods.

- ◇ **Spatial Separation:** Land uses that produce heavier traffic scenarios shall be placed away from residential units.
- ◇ **Vertical Stacking:** Flat-roof style structures may be implemented for upper-floor parking and loading.
- ◇ **Access:** Access shall be allowed from more than one side of a site to allow for better separation of pedestrian, cycling, and vehicle access to reduce the risk of collisions and large distribution vehicles.
- ◇ **Laneways:** Laneways shall be sensitive to pedestrian spaces by carving out walkable space in the building mass. This includes vegetation, dark sky-friendly lighting, and amenities for pedestrian use.
- ◇ **Shared lobbies:** Mixed-use buildings (including industrial and/or office spaces) may require shared lobbies to foster community and interaction among tenants.
 - » It is important to ensure that there are not substantial conflicts between uses that have safety implications.
- ◇ **Location:** Additional considerations for industrial and non-industrial compatibilities includes proximity to future public transit which can reduce parking demands and activate streets for more complete neighborhoods. These locations should be evaluated if public transit plans are implemented in the Plan Area.

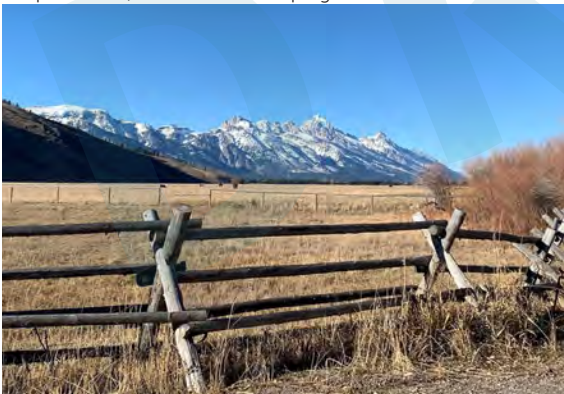
Design Standards



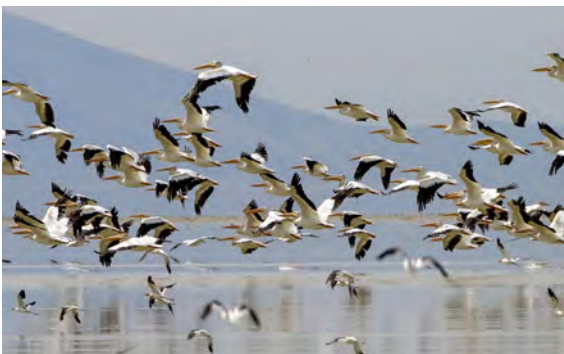
Graphic 2.15 | Outdoor Pavilion



Graphic 2.16 | Natural Landscaping



Graphic 2.17 | Nature-Inspired Design



Graphic 2.18 | Birds at the Great Salt Lake

Standards for Natural Open Space

Natural open space consists of critical habitat, regionally significant agriculture, and connecting open spaces. Development in these areas is restricted to passive recreational amenities.

1 | Wetland Design Standards

1.1 | Planting

Wetlands are home to very beneficial habitats that can support carbon sequestration and improve water quality. As development increases, mitigating the impacts on wetlands is essential for the area. Plant species is an example of a simple design standard that can be incorporated into properties in a close proximity to this critical habitat.

- ◇ Encouraging and/or requiring native plant species can promote healthy wetland habitat in the face of increasing development.
- ◇ Non-native/invasive species mitigation: Upkeep of vegetated areas should be a continuous effort of property owners. This includes proper management of invasive and non-native plant species that may have a negative impact on the natural wetland habitat.
 - » Utilizing natural mitigation techniques should be encouraged as to avoid run-off from herbicide and pesticide product.



Graphic 2.19 | Education Center

1.2 | Trails and Boardwalks

Integrating boardwalks and trails adjacent and into wetlands can provide educational and leisure activities for the community in and beyond the Plan Area. Access to these critical areas must be designed in a way that protects the natural habitat while also providing experiences that are otherwise experienced by only a few individuals. It is important to take inventory of the wetland and partner with ecologists before implementing a trail system.

- ◇ Working group: Educational and recreational programming is a welcomed amenity, however, start up can be difficult without willing partners and active volunteers. Establishing a working group can help implement a well-rounded, comprehensive wetland program.
- ◇ Trail Kiosk and Parking: Integrating educational and recreational opportunities with the wetlands can benefit those beyond the Plan Area. Therefore, establishing a trail kiosk and parking area will provide more convenient access to this amenity area.
- ◇ Connectivity: Connecting the wetlands to the upland environment can help the user experience the relationship between the two environments.
- ◇ Signage: Creating a recognizable sign program can help users identify the trails and remain on trail. The program can also include interpretive signage that indicates points of interest, or educational information about the wetlands and uplands.
- ◇ Trail type: It is important to evaluate what type of trails are appropriate in and around the wetland to mitigate the impacts on the natural environment. Purposeful design can also help mitigate unnecessary costs for development and maintenance.
 - » Trails rather than boardwalks are appropriate in areas where there is raised ground through the wetland or around the wetland. Soft-surface trails require little investment.
 - » Boardwalks are needed where adjacent lands are flat (vegetation is tall) and allows for the ground beneath to remain somewhat natural.



Graphic 2.20 | Natural Multiuse Trail



Graphic 2.21 | Boardwalk-Style Trail



Graphic 2.22 | Informational Signage



Graphic 2.23 | Wildlife Viewing and Fishing Access





CHAPTER 3

IMPLEMENTATION

Implementation Overview

Implementing the Vision

Implementation refers to the actions Salt Lake City should take to ensure the Plan Area develops in a way that is consistent with the community's vision. The most time-sensitive implementation actions are included as critical path items. Following the critical path items is a list of additional action items recommended to achieve the vision of this Plan.

A critical element in planning for any area is considering water sources and needs. Any development in this area must adhere to Salt Lake City water-related plans and policies.

Critical Path Items

Critical path items are actions that should be abided by the City prior to and as development occurs. Each critical path item will fall into at least one of the following categories: built environment/design, services and infrastructure, and natural environment/preservation. These categories were identified throughout the planning process and are integrated into the various sections of the Plan. The following items are classified as an immediate need, as development pressures are already present in the Plan Area.

Services and Infrastructure

Evaluate Funding Solutions to Redesign 2200 W and Construct 2900 W

Timeframe: Immediate

Responsibility: Various City Departments

2900 W is intended to be developed with the Scannell-Swaner Subdivision and will serve as an additional major arterial road in this Plan Area. The redevelopment of 2200 W and the construction of 2900 W should consider increased vehicle volumes and incorporate pedestrian and biking infrastructure. Below is a list of potential funding opportunities for this action. For a detailed analysis of these tools and their applicability in the Plan Area, see the Financial Implementation Analysis in Appendix D.

- » Tax Increment Areas
- » Public Infrastructure Districts (PIDs)
- » Special Assessment Areas (SAAs)
- » Impact Fees
- » Municipal Energy Tax

Natural Environment/Preservation

Evaluate the Feasibility of Acquiring Sensitive Lands as City-Owned Open Space

Timeframe: Immediate

Responsibility: Salt Lake City Council

There has been a large amount of support for the preservation of open space in the Plan Area, as it serves as a cultural and historical landmark for the region and critical habitat for wildlife. Acquiring and preserving available open space in this area for passive recreation is a high priority. Land adjacent to the Jordan River should be a high priority for preservation. For a list of recommended land acquisition tools, see Chapter 4.

Built Environment/Design

Adopt Development Code Updates

Timeframe: Immediate

Responsibility: Salt Lake City Council

There are several zoning designations within the Plan Area including Light Manufacturing (M-1), Business Park (BP), and Agricultural/Rural Residential (AG-2, AG-5, and Salt Lake County A-2). Although some properties will likely remain agricultural or rural residential, it is anticipated that this area will slowly redevelop into primarily light manufacturing with some preserved open space areas.

General Development Code Updates

The simplest way to encourage development consistent with the City's vision for the Plan Area is to adopt minor edits to these zoning categories. While the City Council may eventually adopt an overlay for the Plan Area, the following Zoning Code updates are "low-hanging fruit" the City can quickly implement.

- » Review landscape requirements to prohibit turf lawns and encourage native plantings in keeping with wetland preservation, particularly in interface areas.
- » Consider a reduction in minimum lot size if clustering for preservation areas.
- » Reconsider setbacks in the zoning code if preserving native habitat, allow more flexibility of the building envelope.
- » In the BP zone, eliminate the requirement of an agricultural buffer in favor of an environmental buffer (keep residential proximity protections when agriculture is a residential use).
- » Amend the Riparian Corridor Overlay zone to include wetland protection buffers.
- » Amend the Lowland Conservancy Overlay zone to include canals and drains in the Plan Area.

Northpoint Specific Development Code

The preferred approach to implement the vision for the Plan Area is a Northpoint-specific development code. A Northpoint-specific code should include:

- » Adopting the Design Standards from Chapter 2 of this document, which includes the recommended setbacks and buffer areas, landscape requirements, building materials and design standards, etc.
- » A modified list of permitted and conditional uses to promote manufacturing and office uses while limiting distribution-focused uses.
- » Incentive-based tools for preserving open and sensitive lands, such as allowing an increase in the maximum building façade length if preserving a larger amount of open space or buffer area than required.

Additional Implementation Items

The following list includes recommended key action items to achieve the vision for the Northpoint Plan Area.

Create a local area utility plan

Timeframe: Immediate

Responsibility: Salt Lake City Department of Public Utilities

Require a local area utility plan to determine future Salt Lake City Department of Public Utilities (SLCDPU) service availability and to ensure utility services can be provided based on the anticipated future land use associated with new development. City policy is that upon the development of a property, the developer will be required to identify and provide all utilities necessary to serve their development, including water, sewer, and stormwater. A local area utility plan shall be provided to SLCDPU for review to support any development application, to ensure adequate service availability, and to identify impacts on existing systems.

Amend the Major Streets Plan

Timeframe: Immediate

Responsibility: Salt Lake City Planning Department and Transportation Division

Amend the Major Streets Plan to reflect the removal of 3200 W as a major road. While shown as a local road on the proposed amended map, it is anticipated that 3200 W will remain an unimproved dirt road and barrier for adjacent wetlands to the west. New development should be prohibited from facing 3200 West. Additionally, the amended map includes the proposed roadway alignment of 2900 W and the realignment of 2100 North to access the airport. See Appendix E for the recommended amendments.

Develop environmental impact standards and align them with current executive orders and master plans.

Timeframe: Short Term

Responsibility: Salt Lake City Planning Department

Create standards for new development that mitigate the impact of said development on nearby habitat and sensitive areas. These standards may include elements such as water saving best practices, dark sky ordinances, landscaping requirements, etc.

Require a buffer of at least 75 feet between wetlands/uplands and any site development (e.g. buildings, parking, site features, and amenities) within the Northpoint Plan Area.

Timeframe: Short Term

Responsibility: Salt Lake City Planning Department

The Great Salt Lake is a complex and delicate ecosystem and impact to this habitat area by new development should be carefully mitigated. A critical part of this mitigation is ensuring there is an adequate buffer between development and the wetland/upland ecosystem. The Plan identifies up to a 200 foot buffer from wetland areas. This should be implemented through either an update to the City's existing Riparian Overlay Zone or a new Northpoint specific development code.

In developing the updated code, the City should consider identifying priority wetland areas and applying the maximum buffer to the highest priority wetlands. Reduced buffer widths may be appropriate based on the condition, function, and goal of the specific wetland buffer. Additionally, the City should allow flexibility of wetland buffers through incentive based tools. For example, the buffer width could be reduced through mitigation measures that include native vegetation restoration.

Coordinate with Salt Lake County to provide efficient police and fire services in the Plan Area.

Timeframe: Short Term

Responsibility: City Council

To provide adequate emergency services to this area, the development of a joint Police/Fire station may be required in the Plan Area. Coordinate with the Police and Fire Department to acquire funding and land in the Plan Area for a new shared facility.

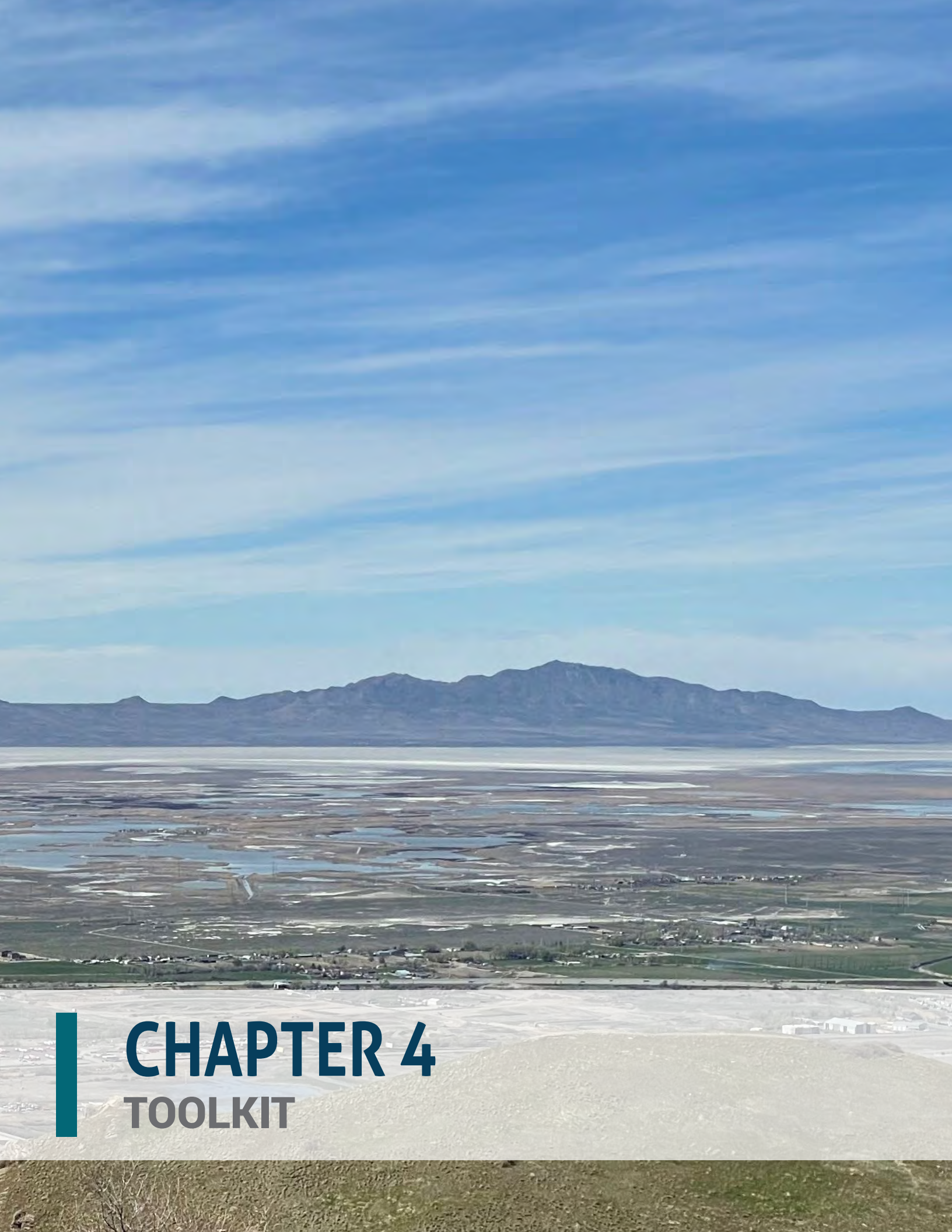
Support the annexation of contiguous parcels within the Plan Area.

Timeframe: Ongoing

Responsibility: Salt Lake City Planning Department

The City supports the annexation of contiguous parcels in this Plan Area for future development and redevelopment.





CHAPTER 4

TOOLKIT

Toolkit Overview



Using the Toolkit

The Northpoint Small Area Master Plan process spanned fifteen months and included one-on-one interviews, workshops, and other public events. As expressed by project participants, key desired outcomes for the future of the Plan Area include:

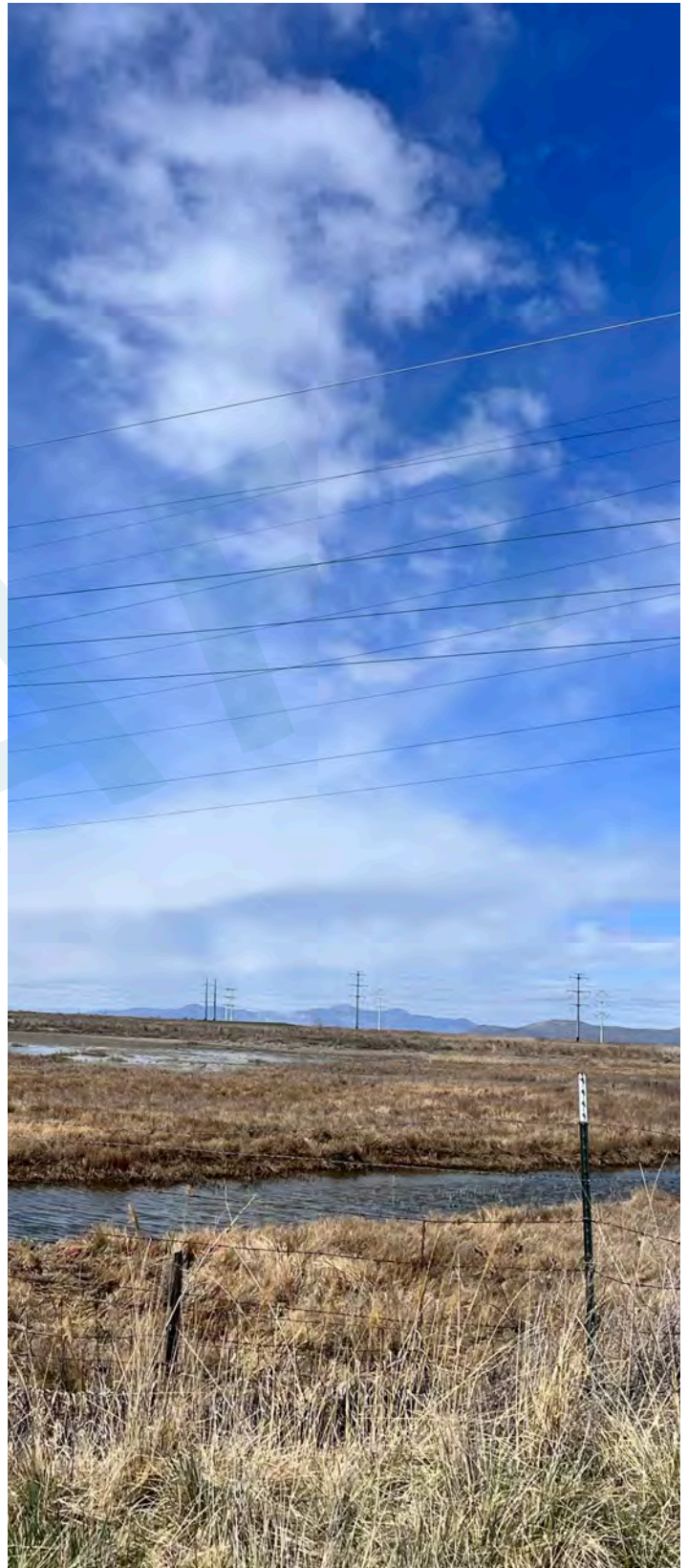
- » Create a program to support a variety of incentives to maintain or improve property values while preserving open space.
- » Identify a future land use plan that allows industrial and business development while maintaining quality of life for existing residential areas and preserving natural habitat.
- » Locate future development in a manner that can support the efficient provision of city services.
- » Identify appropriate buffering, building design, and development characteristics to reduce impacts to the environmental features and wildlife habitat associated with the Great Salt Lake.
- » Recommend methods to reduce the negative impacts that future land uses may have on air quality, water quality, noise, and light.
- » Recommend tools to acquire and/or preserve open space.
- » Recommend strategies to improve traffic flow and safety on 2200 W.

These desired outcomes suggest that while development in the Plan Area is in high demand, policies and strategies need to ensure that development is designed and arranged in a manner that respects the area's sensitive landscape.

A variety of tools have been developed to protect natural open space and locate, configure, and design new development in a manner that protects both existing habitat and natural open spaces. The preservation tools described and analyzed in this Chapter represent existing and potential strategies for the protection of habitat and open space in the Plan Area. Tools have been categorized as regulatory, incentive, or land acquisition. This is not an all-inclusive listing of tools, but an inventory that details each potential tool, and provides examples.

In addition to land preservation tools, this chapter covers financial tools available to fund improvements to or reconstruction of 2900 W.

The benefits and limitations of each tool have been compiled from a number of sources, including university research, other localities' experiences, practical knowledge, and reports by individuals who have made their own evaluations. The implementation tools presented in this Chapter constitute a menu of options that can be considered to achieve the objectives of this Plan.



Land Preservation Tools

Regulatory based tools may be used to protect sensitive lands and agricultural areas within the Plan Area. These tools could be implemented by Salt Lake City through adoption of new zoning and subdivision ordinances.

Clustering of Lots and Open Space/Cluster Development

Clustering is defined as a development pattern typically for residential use, in which homes are grouped together rather than evenly dispersed over the land as in a conventional development.

Benefits	Limitations
<ul style="list-style-type: none">» Protects the natural resources of an area» Creates wider wildlife buffers» Creates opportunity for greater profits by consolidating required open space into larger, more impactful sizes» Reduces impact of development on watersheds» Reduces cost to provide municipal public services depending on how clustering is accomplished	<ul style="list-style-type: none">» Additional zoning requirements» Not a permanent solution to protect land from development pressures» May not be a mandatory tool; thus there may not be assurance that desired project designs will be implemented by developers

Development Code Updates

Code updates establish supplemental land development requirements within a specific area requiring special attention, such as an environmentally sensitive area.

Benefits	Limitations
<ul style="list-style-type: none">» Easily implemented» Allows flexibility in design for developers» Can apply to multiple areas within a city» Time and cost effective	<ul style="list-style-type: none">» Additional zoning requirements» Not a permanent solution to protect land from development pressures

Regulatory Based Tools

47% of participants were in support of clustering lots and open space

30% of participants were in support of development code updates

62% of participants were in support of sensitive landscape studies

37% of participants were in support of special standards

Sensitive Landscape Studies

Studies can determine additional steps that should be taken to mitigate impact of new development to existing habitat.

Benefits	Limitations
<ul style="list-style-type: none">» Helps mitigate impacts of new development on existing habitat and wildlife» Easily implemented» Offers insight into specific site requirements for mitigation	<ul style="list-style-type: none">» Additional zoning requirements» Can be difficult for local officials to enforce because requirements and study results may vary based on specific sites

Special Standards and Design Guidelines

Additional regulations in new development or redevelopment projects can include standards for elements like lighting, landscaping, building materials, noise, and landscape buffers.

Benefits	Limitations
<ul style="list-style-type: none">» Helps mitigate impacts of new development on existing habitat and wildlife» Easily implemented» Allows flexibility in site design while preserving area character and sensitive lands	<ul style="list-style-type: none">» Additional zoning requirements» May not be a mandatory tool; thus there may not be assurance that desired project designs will be implemented by developers» Can be difficult for local officials to enforce unless bonus criteria are clearly spelled out in an ordinance or policy document

Incentive Based Tools

Incentive based tools are voluntary and mostly based on the willingness of the landowner to sell title or an easement on their property. Where public access and use are desired, fee-simple ownership control is preferred through donation, purchase, or bargain sale of land to a government entity, conservation organization, or public charity.

Conservation Easements

Conservation easements are voluntary and legally binding agreements between a landowner (public or private) and a qualifying organization (also public or private), in which permanent limitations are placed on a property's use and development. Conservation easements limit land to uses identified in the easement, and thus protect it from development.

Benefits	Limitations
<ul style="list-style-type: none">» Permanently protects land from development» Landowners may receive income, estate, and/or property tax benefits» Land remains in private ownership and on the tax rolls	<ul style="list-style-type: none">» Tax incentives may not provide enough compensation for many landowners» Since program is voluntary, it can be challenging to preserve large tracts of contiguous land or specific areas to be protected

Transfer of Development Rights (TDR)

TDRs are tools that establish areas within a community for preservation (sending zones), and additional growth (receiving zones). Sending zones can be areas of agricultural land, open space, or other properties important to preserve. Receiving zones are areas that the community has designated as appropriate for additional or increased development.

Benefits	Limitations
<ul style="list-style-type: none">» Permanently protects land from development pressures» Landowner is paid to protect their land» Local government can target locations effectively» Utilizes free market mechanisms» Land remains in private ownership and on tax rolls	<ul style="list-style-type: none">» Can be complex to administer» Receiving area must be willing to accept higher densities» Can be a difficult program to establish, especially in areas without city zoning» May require cooperative agreements among several local governments to establish sending and receiving zones

56% of participants were in support of conservation easements

30% of participants were in support of TDR Programs

47% of participants were in support of PDR Programs

25% of participants were in support of Preferred Development Sites

Purchase of Development Rights (PDR)

PDRs refer to the purchase of development rights on certain parcels of land by a unit of government or a non-profit entity. Once purchased, a conservation easement is placed on the property.

Benefits	Limitations
<ul style="list-style-type: none">» Permanently protects land from development» Landowner is paid to protect their land, while allowing for ongoing use» Local government can target desirable locations effectively» Land remains in private ownership and on the tax rolls» Program is voluntary	<ul style="list-style-type: none">» Can be costly for local unit of government, therefore land is generally protected at a slower rate» Land remains in private ownership, typically with no public access» Because the program is voluntary, it can be challenging to preserve large tracts of contiguous land

Preferred Development Sites

Also known as priority or target development areas, these are locations that have been identified by a local government as favored for residential, commercial, and office growth based on adopted growth management policies and plans. Development can involve new construction, redevelopment, and/or adaptive reuse of buildings. Local governments may offer incentives, such as reduced fees or increased housing density to developments in these areas in order to make them more attractive to developers.

Benefits	Limitations
<ul style="list-style-type: none">» Land remains in private ownership and on the tax rolls» Local government can target locations effectively» Can be low cost to local unit of government	<ul style="list-style-type: none">» Can be a difficult program to establish and administer» Not a permanent solution, delays development in sensitive areas» Tax incentives may not provide enough compensation for many landowners

Land Acquisition Tools

Acquisition and management of open space can be combined with regulatory measures to broaden the effectiveness of a preservation program. These tools preserve open space and their functions in the long-term. Although typically the most expensive solution, acquisition is the strongest and surest means of protection.

Lease

A lease is an agreement between agency and landowner to rent the land in order to protect and manage sensitive resources.

Benefits	Limitations
<ul style="list-style-type: none">» Low cost approach to site protection» Landowner receives income and retains control of property» An alternative for preservation-minded landowners not ready to commit to sale of permanent easement» Restrictions can be included in the lease to direct the activities of the conservation agency on the land	<ul style="list-style-type: none">» Short-term protection strategy» Leases are not permanent

Mutual Covenant

A mutual covenant is an agreement between adjoining landowners to control future land uses through mutually agreed upon restrictions.

Benefits	Limitations
<ul style="list-style-type: none">» Permanent covenants can be enforced by any of the landowners or future landowners of the involved properties» Significant incentive to comply with restrictions, since all parties are aware of use controls» Can reduce property taxes	<ul style="list-style-type: none">» Loss in market value from mutual covenants does not qualify as a charitable deduction for income tax purposes» High cost

29% of participants were in support of Lease Agreements

31% of participants were in support of Mutual Covenants

27% of participants were in support of Land Banking

38% of participants were in support of Land Exchange

Land Banking/Land Purchase

Land banking occurs when land is purchased and reserved for later use or development. Land could be leased for immediate use (e.g. agriculture or athletic fields) or held for eventual resale with restrictions. The local government functions as a land trust.

Benefits	Limitations
<ul style="list-style-type: none">» Local government proactively identifies and purchases resource land» Lowers future preservation costs by working as a defense against future increases in land prices, speculation, and inappropriate development	<ul style="list-style-type: none">» High cost» Requires large upfront expenditures» Public agency must have staff to handle land trust functions of acquisition, management, lease, or resale

Land Exchange

Land exchange is the process by which land sought to be protected may be exchanged for another parcel that is more suitable for development

Benefits	Limitations
<ul style="list-style-type: none">» Lower acquisition costs» Scattered properties can be exchanged for a single, larger parcel	<ul style="list-style-type: none">» Complicated process» Not widely known and rarely used» Subject to IRS regulations» Property owners must be willing to participate, and properties must be of equal value» High cost

Financial Tools

Overview

Northpoint represents an opportunity for Salt Lake City to encourage economic development that is compatible with the unique natural and built environment of the area, including proximity to the Salt Lake City International Airport. This area is best suited for business park and industrial development yet is hampered by the lack of significant infrastructure including transportation options and high-quality fiber broadband to the area. To realize its potential, the area requires substantial infrastructure improvements. Funding options for these improvements are discussed in this section of the report.

It is a challenging time to fund infrastructure as construction costs are rising rapidly, along with interest rates. Infrastructure is generally needed before development can occur, which means that revenues generated by the project are not available for funding at the time they are most needed. Rather, other funding means must be identified, with revenue streams generated from development used later as a payback mechanism.

Economic development is a key component of generating new revenue streams and is addressed in the full Financial Implementation Report in Appendix D. This chapter contains with the potential funding mechanisms that such development could enable.

Market Analysis

Northpoint is suitable for industrial and agricultural use, with limited residential. The area is proximate to the Salt Lake City International Airport and, as such, experiences high noise levels that make residential development difficult.

The industrial market is strong in Salt Lake County, with a vacancy rate of only 2.2 percent and rising lease rates which have increased from an average (NNN) rate of \$0.53 in 4th quarter 2020 to \$0.63 in 4th quarter 2021. Total Salt Lake County inventory approximates 135 million square feet, with 9 million square feet of space under construction. In the northwest quadrant of Salt Lake County, the vacancy rate is 2.65 percent, with year-to-date (YTD) absorption of 7.5 million square feet and an average asking rate of \$0.60 (NNN).

Based on vacant acreage in the Plan Area that the Salt Lake County Assessor's Office currently classifies as industrial, the area could absorb an additional 650,000 to 1,000,000 square feet of industrial space. This appears reasonable given current absorption patterns and the shortage of industrial space in the market. The biggest obstacles to industrial development appear to be supply chain shortages, rising construction costs and rapidly escalating interest rates.

Financial Tool | Tax Increment Areas

Through the creation of a tax increment area, tax revenues generated within the designated Plan Area are split into two components:

- » (i)Base Revenues | The amount available before the tax increment area is established. Base revenues are shared among a mix of local governments that have the power to assess taxes such as schools, cities, counties, and special districts; and
- » (ii)Incremental Revenues | These are tax revenues in excess of the base revenues that are generated by new growth in the Plan Area. If a Plan Area is created, the incremental tax revenues can flow to the Plan Area for a period of time to encourage economic development.

Some states, including Utah, allow incremental local sales tax revenues, as well as property taxes, to flow to a Plan Area for a period of time. By giving exclusive use of incremental revenues to the Plan Area, the creation of a successful tax increment area generates a new revenue stream that can be used to pay for projects, provide incentives to developers, or collateralize tax increment bonds.

The most common uses of tax increment have been for infrastructure such as roads, utilities, telecommunications, electrical upgrades and burying power lines, and parking structures. Tax increment has also been used for demolition, tenant improvements, land acquisitions, environmental cleanup, trails, lighting, signage, playgrounds, incentives to developers, economic development activities and housing.

Utah currently allows for the enactment of three types of tax increment areas:

- » Community Reinvestment Areas (CRAs)
- » Transportation Reinvestment Zones (TRZs)
- » Housing & Transit Reinvestment Zones (HTRZs)

Of these three types of tax increment areas, CRAs and TRZs could be used as financing tools for the Plan Area. HTRZs rely on density of housing and this type of development is not suitable for Northpoint.

Community Reinvestment Areas (CRA)

In Utah, tax increment areas have been known by a wide variety of names over time – RDAs, URAs, EDAs, CDAs, and now as CRAs or Community Reinvestment Areas. As of 2016, the Legislature combined all types of Plan Areas—urban renewal, economic development, and community development into a new single “Community Reinvestment Plan Area” (CRA). Existing Plan Areas will be allowed to continue, but all new Plan Areas will be known as CRAs.

The CRA Budget may either be approved by a Taxing Entity Committee (TEC) or through Interlocal Agreement with taxing entities, except where the Agency chooses to conduct a blight study to determine the existence of blight and to utilize limited eminent domain powers, which requires the approval of the TEC of both blight and the budget.

If there is a finding of blight, 20 percent of the tax increment must be set aside for affordable housing. For all other projects, 10 percent of the tax increment is required to be set aside for affordable housing, if the annual increment is over \$100,000. However, housing funds may be spent for affordable housing statewide and are not limited to being spent within a Plan Area. Noticing and hearing requirements apply with the CRA designation.

After the tax increment collection period has expired, the tax increment dollars that previously flowed to the CRA will flow to the taxing entities that levy the property taxes within the Plan Area. In most cases, taxing entities receive more property tax revenues annually following expiration of the tax increment collection period than before, as property values are likely to have increased significantly through the redevelopment process.

Benefits	Limitations
» Creates a new revenue stream.	» Requires cooperation of other taxing entities.
» Relatively easy to create.	» 10% of revenues must be directed to affordable housing.
» Flexible uses of funds.	» Revenues may take years to build up as development occurs over time.

Transportation Reinvestment Zone (TRZ)

A TRZ is one type of area that can be formed where tax increment can be used to accelerate development within the defined Plan Area. According to Utah Code §11-13-103(22), “Transportation Reinvestment Zone” means an area created by two or more public agencies by interlocal agreement to capture increased property or sales tax revenue generated by a transportation infrastructure project. TRZs are ideal for projects such as Frontrunner, light rail, or major arterials that span multiple jurisdictions.

Any two or more public agencies may enter into an agreement to create a transportation reinvestment zone but one of these entities must have land use authority over the TRZ area – in other words, Salt Lake City must be a partner in this endeavor.



Benefits	Limitations
<ul style="list-style-type: none">» Creates a new revenue stream.» Relatively easy to create.» Projected to produce substantial revenue stream over time.	<ul style="list-style-type: none">» Revenue directed to transportation projects will not be available to provide other services.» Requires cooperation between at least two entities.» Must find a nexus with transportation projects to justify use of the increment.
<ul style="list-style-type: none">» No affordable housing requirement.	<ul style="list-style-type: none">» Revenues may take years to build up as development occurs over time.

Tax Increment Bonds

Tax Increment Bonds were developed in California in 1952 as an innovative way of raising local matching funds for federal grants. They became increasingly popular in the 1980s and 1990s, when there were declines in subsidies for local economic development from federal grants, state grants, and federal tax subsidies (especially industrial development bonds).

Tax Increment Bonds are collateralized by the incremental growth in property taxes within a given Plan Area. They capture the future tax benefits of real estate improvements to pay the present cost of those improvements. It is a financing strategy designed to make improvements to a targeted Plan Area or district without drawing on general fund revenue or creating a new tax.

Benefits	Limitations
<ul style="list-style-type: none">» Create a new revenue stream that can fund capital improvements and economic development.» Creating entity does not have to bear financial burden alone but can share it with other taxing entities within a Plan Area.» Tax increment revenues can be used to pay for administrative expenses.	<ul style="list-style-type: none">» Tend to carry higher interest and costs of issuance.» Often require the cooperation and agreement of multiple taxing entities to generate sufficient incremental revenues to finance the desired infrastructure.» Bonds can't be sold unless the tax increment is already flowing or is imminent and nearly certain to flow or is enhanced by a government's credit or other mechanism.
<ul style="list-style-type: none">» Financial and legal liability is limited by having a redevelopment agency.	<ul style="list-style-type: none">» Typically take longer from start to finish than other financing types.
<ul style="list-style-type: none">» Creating entity may gift tax revenues or property to provide incentives for development.	<ul style="list-style-type: none">» Critics of Tax Increment Bonds sometimes assert that tax increment is just a reallocation of tax revenues by which some municipalities win, and others lose.
<ul style="list-style-type: none">» Creating entity may be able to encourage or accelerate the timeframe of desired development types through offering tax increment incentives to the developer.	
<ul style="list-style-type: none">» Mortgage on the property can also be given as bond security under Utah law in addition to incremental revenue.	

Financial Tool | Public Infrastructure Districts (PIDs)

PIDs are generally most successful in larger, undeveloped areas where there are significant infrastructure needs. Because the unanimous consent of all property owners is required for the creation of a PID, it is difficult to establish PIDs in areas with numerous property owners. However, portions of the study area could be included – especially those areas with larger parcels, fewer property owners, and significant infrastructure needs.

If created, a PID can be combined with other revenue sources such as tax increment and those revenues could be used to pay the PID bonds. These funding tools may further facilitate development and increase property values, which may in turn provide for more opportunities to fund basic infrastructure (through tax increment financing or general tax collection). The PID tool allows for creation of a separate taxing entity in order to fund public infrastructure. Ultimate users of the property pay for the improvements via the taxing entity through property assessments. These assessments permit for bonding, allowing for covering upfront infrastructure expenses that are repaid over periods typically near 30 years. This tool results in higher property taxes for property owners/users in the defined district.

Benefits	Limitations
<ul style="list-style-type: none">» Create a new revenue stream that can fund capital improvements and economic development.» Any debt issued is not on the books of the local government entity.» Can raise a significant amount of revenue with legally-allowed tax rates of up to 15 mils.	<ul style="list-style-type: none">» Tend to carry higher interest and costs of issuance.» Cities may feel it limits public support for future tax rate increases or bond elections due to the perception of already-high rates.» Requires unanimous support of all taxing entities to put in place.
<ul style="list-style-type: none">» Accelerates development timeframe through upfront funding for capital costs.	<ul style="list-style-type: none">» Ongoing PID governance
<ul style="list-style-type: none">» Can reduce the need for impact fees.	<ul style="list-style-type: none">» Competitiveness of site with other sites given higher tax rates
<ul style="list-style-type: none">» Mortgage on the property can also be given as bond security under Utah law in addition to incremental revenue.	
<ul style="list-style-type: none">» Cost is much lower than other development financing.	

Special Investment Areas (SAAs)

Special Assessment Areas (“SAAs”), formerly known as Special Improvement Districts or “SID”s, are a financing mechanism that allows governmental entities to designate a specific area for the purpose of financing the costs of improvements, operation and maintenance, or economic promotion activities that benefit property within a specified area. Entities can then levy a special assessment, on parity with a tax lien, to pay for those improvements or ongoing maintenance. The special assessment can be pledged to retire bonds, known as Special Assessment Bonds, if issued to finance construction of a project. Utah Code §11-42 deals with the requirements of special assessment areas.

The underlying rationale of an SAA is that only those property owners who benefit from the public improvements and ongoing maintenance of the properties will be assessed for the associated costs as opposed to other financing structures in which all City residents pay either through property taxes or increased service fees. While more information about SAAs is included below, it could be difficult politically for the City to obtain support from a large number of property owners.

Benefits	Limitations
<ul style="list-style-type: none">» Bonds are tax-exempt although the interest cost is not as low as a GO or revenue bond» No requirement to hold a bond election but the City must hold a meeting for property owners to be assessed before the SAA can be created» Only benefited property owners pay for the improvements or ongoing maintenance	<ul style="list-style-type: none">» Forty percent of the assessed liability, be it one property owner or many could defeat the effort to create the SAA if they do not want to pay the assessment» Some increased administrative burden for the City although State law permits an additional amount to be included in each assessment to either pay the City’s increased administrative costs or permit the City to hire an outside SAA administrator» The City cannot assess government-owned property within the SAA
<ul style="list-style-type: none">» Limited risk to the City as there is no general tax or revenue pledge	
<ul style="list-style-type: none">» Flexibility since property owners may pre-pay their assessment prior to bond issuance or annually thereafter as the bond documents dictate – if bonds are issued	

Impact Fees

Impact fees are one-time fees paid by new development to offset the capital costs associated with new development for basic utilities such as water, sewer, storm water, public safety, roads and parks/trails. In order to collect impact fees, cities must carefully follow the requirements of Utah Code 11-36a which includes the following major steps.

- » Prepare and pass a resolution authorizing study of an impact fee
- » Conduct an impact fee study to determine the appropriate amount of such a fee
- » Provide public notice of the possible fee 14 days prior to the public hearing
- » Hold a public hearing to take comment regarding the proposed fee

Salt Lake City has already established impact fees that could be used to generate revenues on projects developed within its City boundaries. However, Salt Lake County would need to charge impact fees on the unincorporated areas of North Point. Impact fees collected would need to be spent on capital projects listed in each respective entity’s Impact Fee Facilities Plans (IFFPs). Therefore, careful coordination would need to take place between Salt Lake City and the County to ensure that the costs of needed projects are fairly allocated between the two entities.

Benefits	Limitations
<ul style="list-style-type: none">» New development pays for its fair share of the costs incurred by new development	<ul style="list-style-type: none">» Adds additional costs to development» Impact fees are generally paid when building permits are issued; therefore, funds are often not available upfront when infrastructure needs are greatest» Impact fees cannot be used to cure existing deficiencies





APPENDIX A

EXISTING CONDITIONS

Existing Conditions

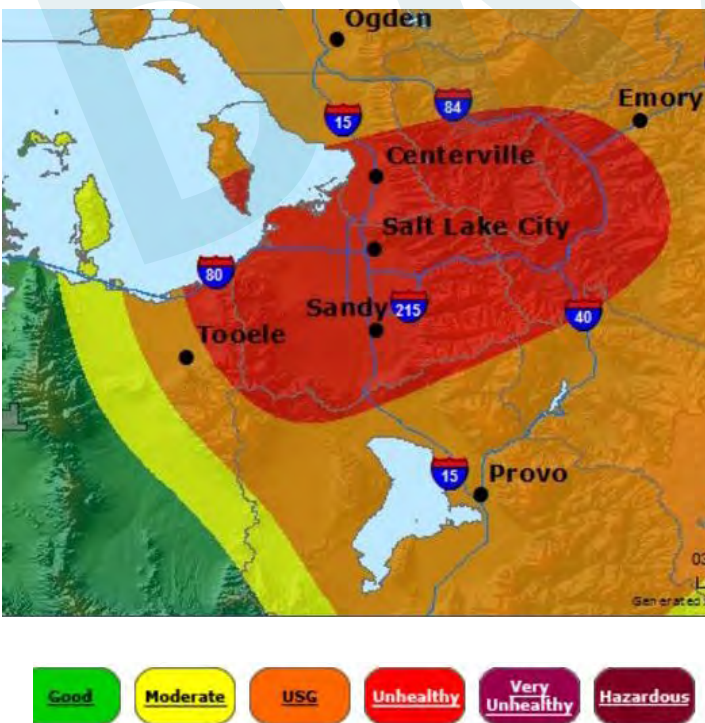
Water and Air Quality

Air Quality

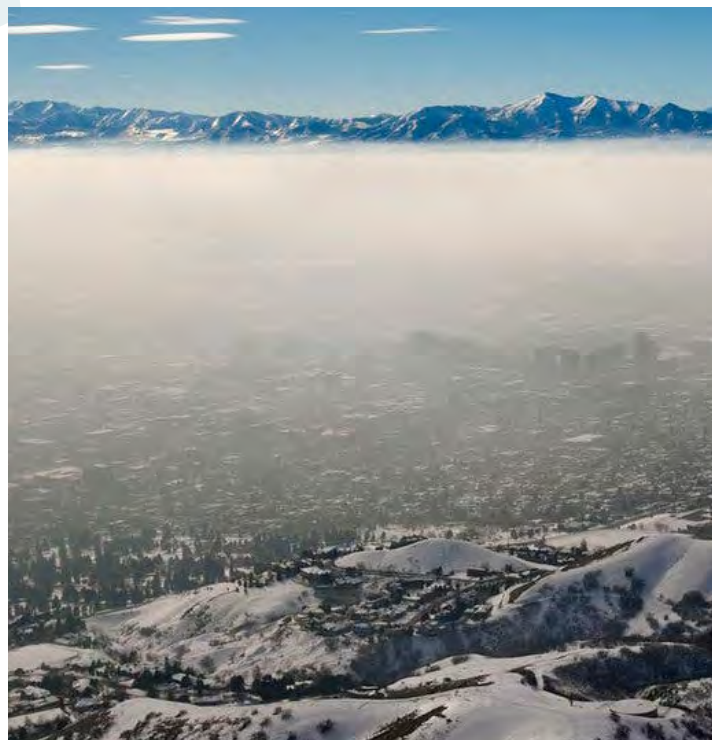
Salt Lake City is often faced with some of the worst air quality in the world. Major declines in air quality typically occur during the summer or winter due to the Salt Lake Valley's unique geographical makeup and position. In the summer, wildfire smoke often travels east from California, Oregon, and the region's mountain ranges adding to pollution from cars, industry, and other elements leading to harmful ozone levels. In the winter, close proximity to the Wasatch Mountains leads to temperature inversions in which cold air gets trapped under a layer of warm air, acting like a lid keeping pollutants from escaping. During the winter, air pollution sources are transportation (50%); area sources (e.g. gas stations, auto-body shops, etc.) (35%); and industry (15%).

The Plan Area experiences these same seasonal issues with air quality, as well as consistent impacts due to proximity of both the Salt Lake City International Airport, and I-215.

I-215 limits connectivity to residential neighborhoods and services in both Salt Lake City and North Salt Lake City. With few daily services, such as grocery stores, within the expanded area, residents contribute to higher trips and higher mile traveled, exacerbating air quality issues.



Graphic 1.3 | Regional Air Quality | Source: AirNow.Gov



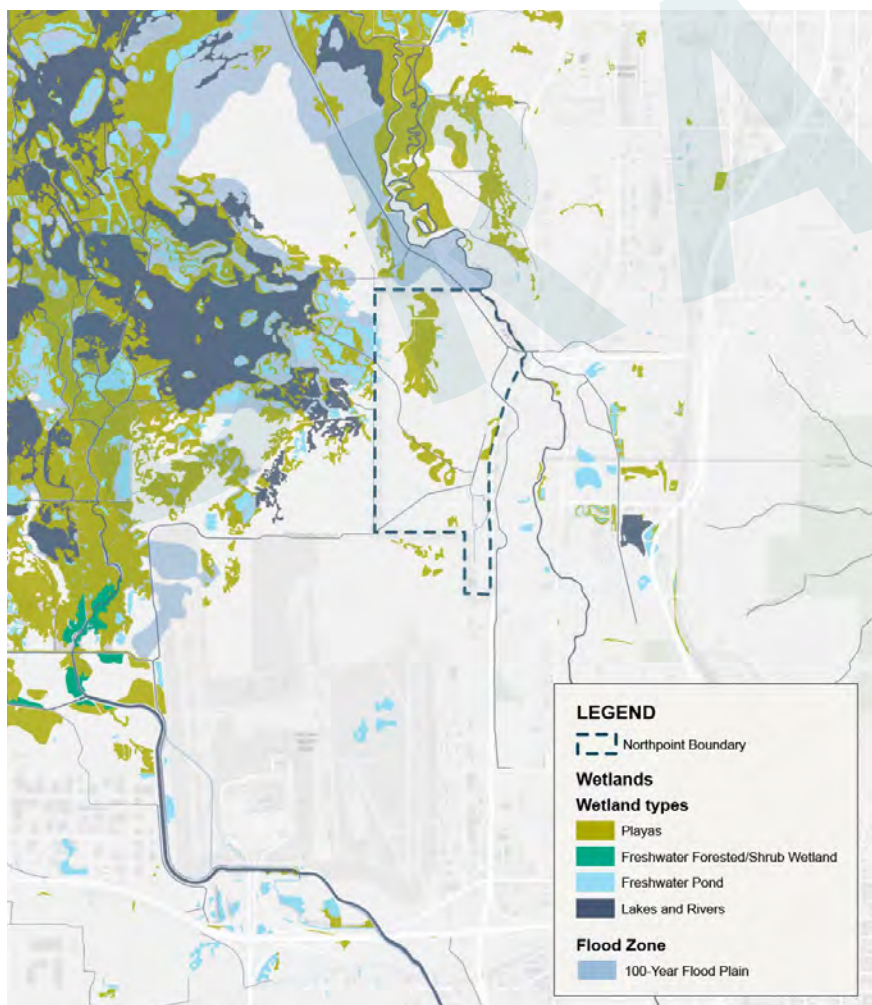
Graphic 1.4 | SLC Air Quality | Source: Scott Winterton Deseret News



Water and Wetlands

The presence of wetlands adjacent to the Jordan River Delta and at the edge of the Great Salt Lake is the most pertinent environmental issue in the area. Roughly 75% of Utah's wetlands surround the Great Salt Lake, providing environmental and socioeconomic benefit.

The wetlands surrounding the Northpoint Subarea are part of an intricate and diverse ecosystem. Wetlands benefit the environment by acting as sponges to capture, store, and slowly release water, storm buffers, groundwater and aquifer recharge, and sediment traps. Wetlands also serve as critical habitat areas by providing food, shelter, and resting places. Wetland benefits extend to provide recreational and agricultural opportunities.



Graphic 1.5 | Wetlands Surrounding Northpoint | Source: National Wetlands Inventory

A portion of these wetlands are designated playas, categorized by their dry, hollowed-out form that fill with water during rainstorms and by underlying aquifers. The Great Salt Lake is the largest saltwater lake in the Northern Hemisphere, meaning as the playas fill and eventually evaporate, they leave large salt deposits behind. Freshwater forested and shrub wetlands are found adjacent to the area, and are typically associated with woody plants such as willows.

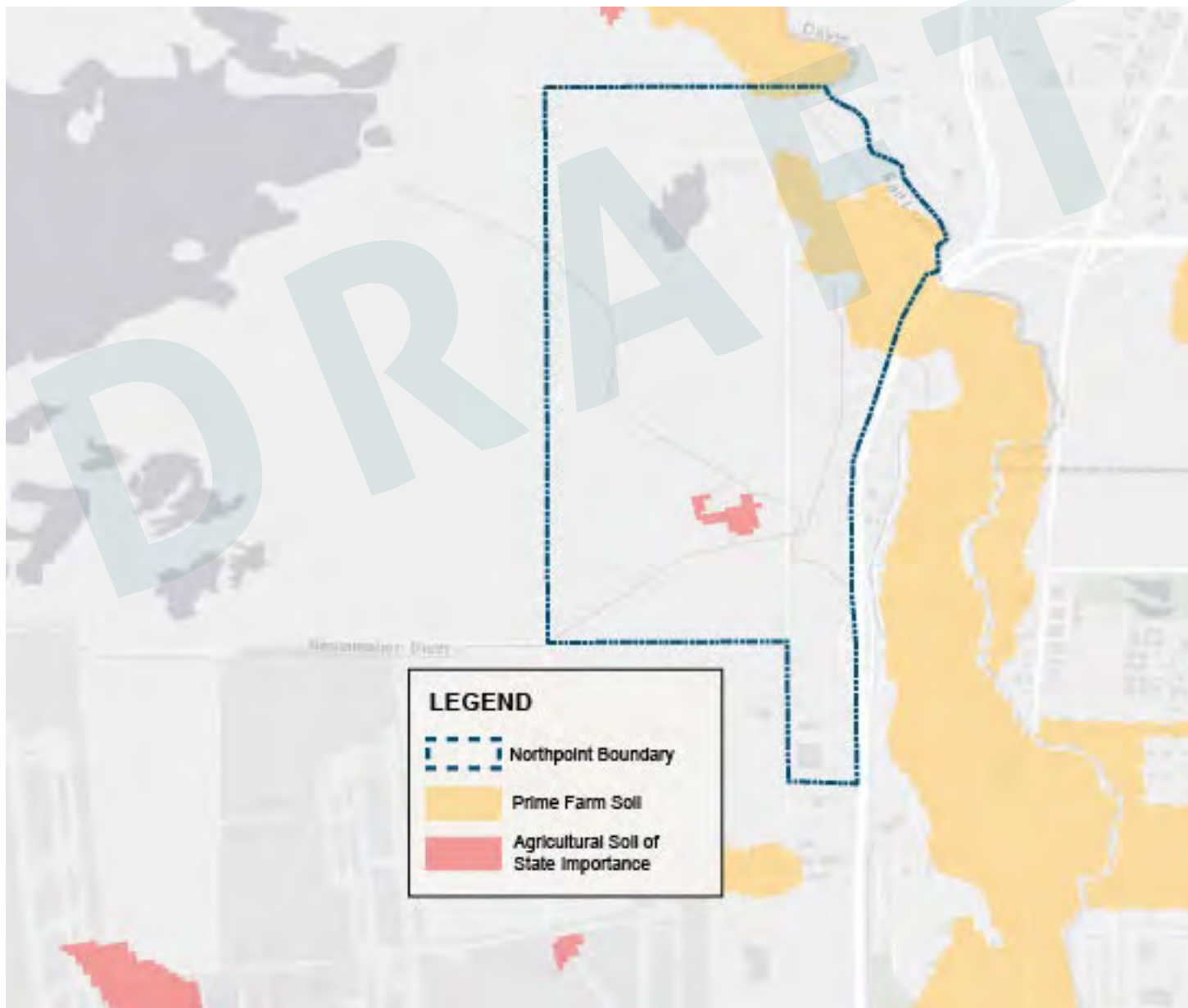
The current historic high water elevation for the Great Salt Lake is 4,211 feet last reached in 1986, and causing dramatic flooding. As of November 2021, the Lake's water level has dropped to the lowest in recorded history at 4,190 feet, likely due to the extreme drought conditions the state is facing. In response to the unpredictability of the Lake, most planning agencies identify the contour of 4,217 feet, as the limit of safe development. There are no sites within the Plan Area that fall below this elevation.

Natural Environment

Soil Types

The soil types within Northpoint vary and provide considerations for the types of development that can be accommodated in the Plan Area. The soil types dominating the area are fine sandy loam, silt loam and silty clay loam. Most of these soils have a water table depth between zero and fifty inches and are subject to the effects of frost.

These high water table depths affect drainage and compressibility which impact new development potential. In addition, the soil types that dominate the area can cause problems for septic systems and filter fields, making it harder to maintain water quality.



Graphic 1.6 | Prime Agricultural Soil | Source: National Resource Conservation Service

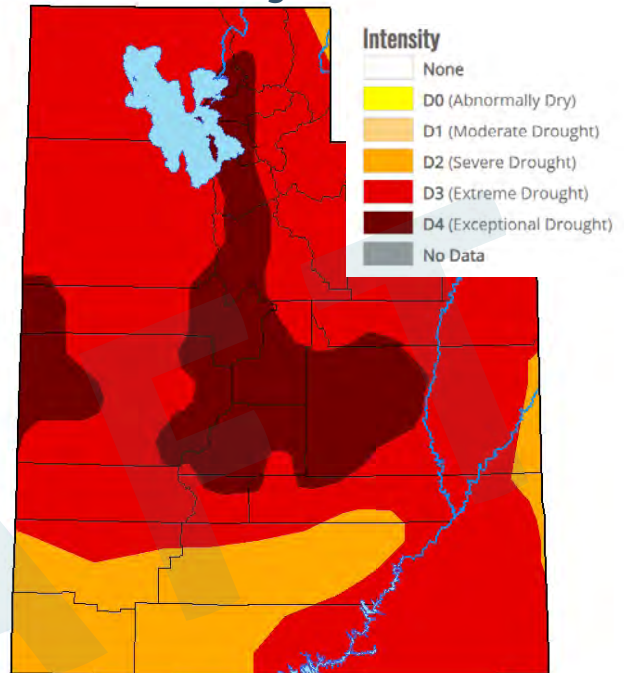
Hazards

The greater Salt Lake City area faces natural hazards that impact rate and location of development. As climate change continues to exacerbate extreme weather events, planning with these common hazards in mind can help maintain the safety and comfort of the community.

Clean air and water supply are among the top concerns of Salt Lake residents. In August of 2021, Salt Lake City was ranked the worst air quality of any major city in the world by IQAir.com, prompting residents to take extra precautions. The Salt Lake County Health Department released tips to stay safe during extreme air conditions such as staying indoors with windows shut, avoiding exercise, and wearing masks outdoors.

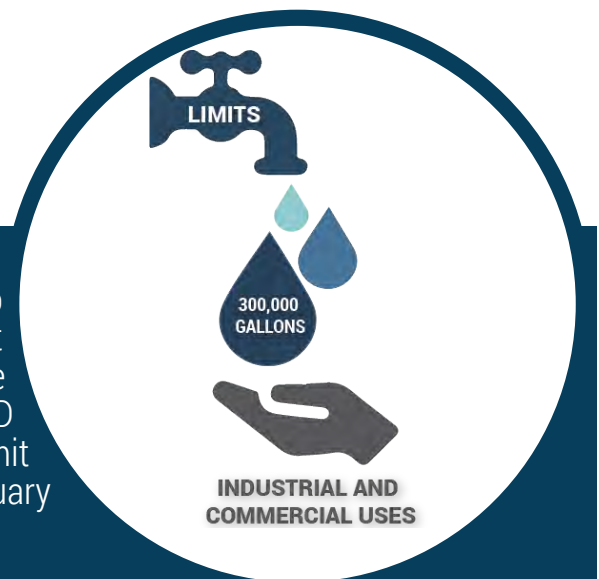
The area, along with many other parts of the state, is currently under exceptional drought conditions, with fire restrictions and irrigation allotment reductions in place. Salt Lake City also experiences threats of extreme heat, wildfire, debris flows, flooding and earthquakes.

Summer 2021 Drought Conditions



Graphic 1.7 | Utah Drought Conditions | Source: National Drought Mitigation Center at University of Nebraska-Lincoln, 2021.

The City of Salt Lake has proposed land use amendments to prevent large water users from being located within The City that may have a significant impact on The City's water resources. The new limit for industrial and commercial land uses is 300,000 GPD (based on an annual average) of potable/culinary water. The limit applies to existing and new uses on a temporary basis until January 2022.



Wildlife and Habitat

The Great Salt Lake and surrounding wetlands are a crucial habitat for many species of animals. With 400,000 acres of wetlands, birds of regional and national importance are drawn to the area as a sanctuary for breeding and eating. Every year, millions of birds from 338 different species stop here to feed during migrations. Among the most common species observed in the Plan Area are the European Starling, Red-winged Blackbird, Yellow-headed Blackbird, Northern Pintail, and Canada Goose.

Although the Farmington Bay area is classified as freshwater, the northern-most regions of the Great Salt Lake can be composed of nearly 28% salt. This creates a wide diversity of habitats for many different plants, invertebrates, reptiles, amphibians, mammals, birds, and insects such as the Monarch Butterfly which is now on the endangered species list.



Graphic 1.8 | Dominant Bird Species in Northpoint



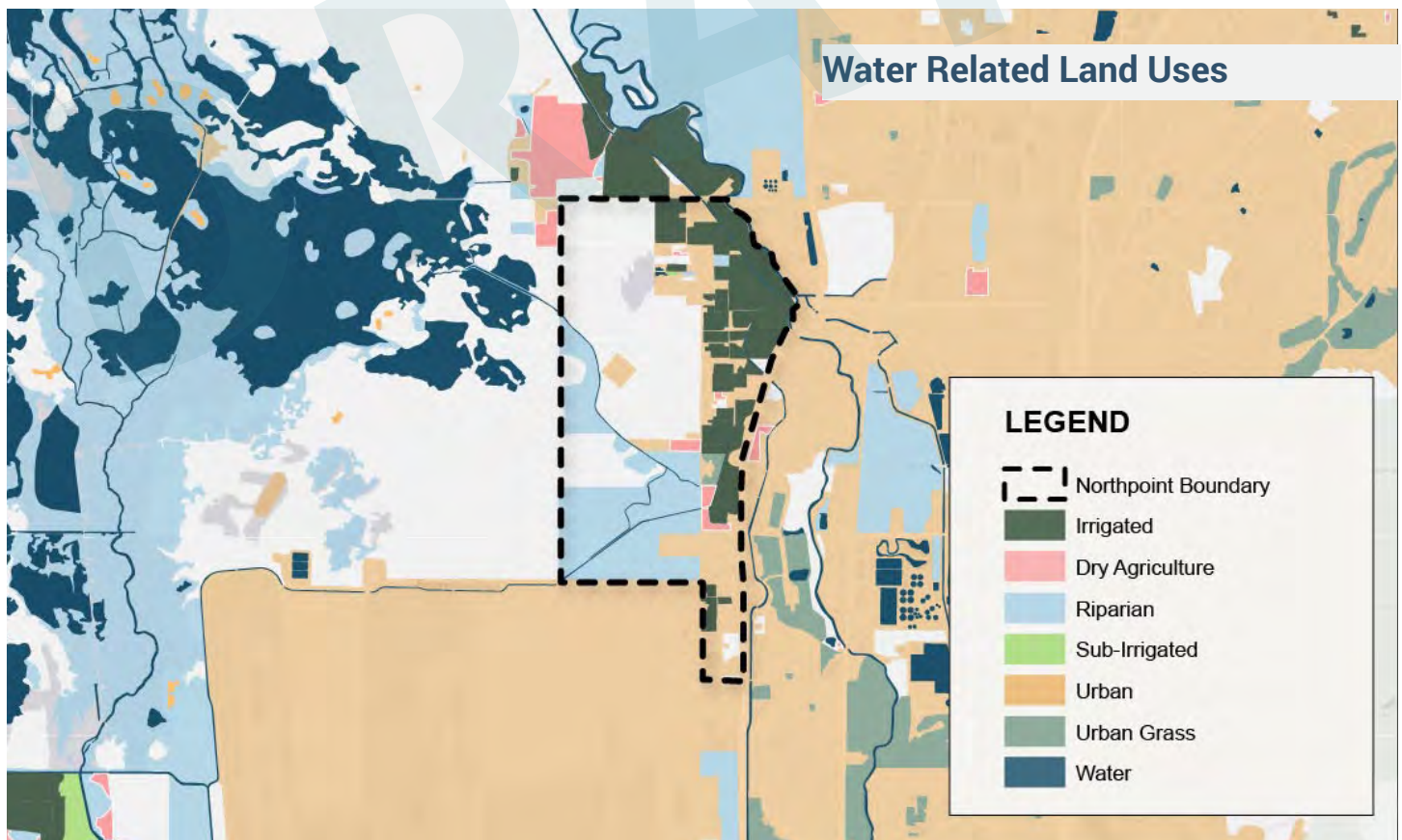
Graphic 1.9 | Bird Habitat | Source: Department of Wildlife Resources GIS Data

Organizations

There are many organizations with interest in the Plan and surrounding areas, including the Duck Clubs, Salt Lake City International Airport, and Friends of the Great Salt Lake. The Friends of Great Salt Lake is a nonprofit organization founded in 1994 to protect the Great Salt Lake ecosystem and increase public awareness and appreciation. The Rudy Duck Club, founded in 1909 and named after the original land owner Frank Rudy, acquired land and associated water rights in the early 1900s to preserve the ecosystem for private duck hunting.

Agriculture

The top producing crops in Salt Lake City, according to the 2017 Census of Agriculture, are wheat, hay, vegetables, pumpkins, and sweet corn. Within the Plan Area, current residents also own a variety of livestock. The majority of the housing stock supports the agricultural uses surrounding them. Within these lots there has been a pattern of subdividing larger lots into small lots for family members. There is a rich history of the agricultural lifestyle within Northpoint that the community desires to be preserved. According to the State Soil Conservation Service, the Plan Area contains prime farmland located north of 2800 North on the eastern side of 2200 West.



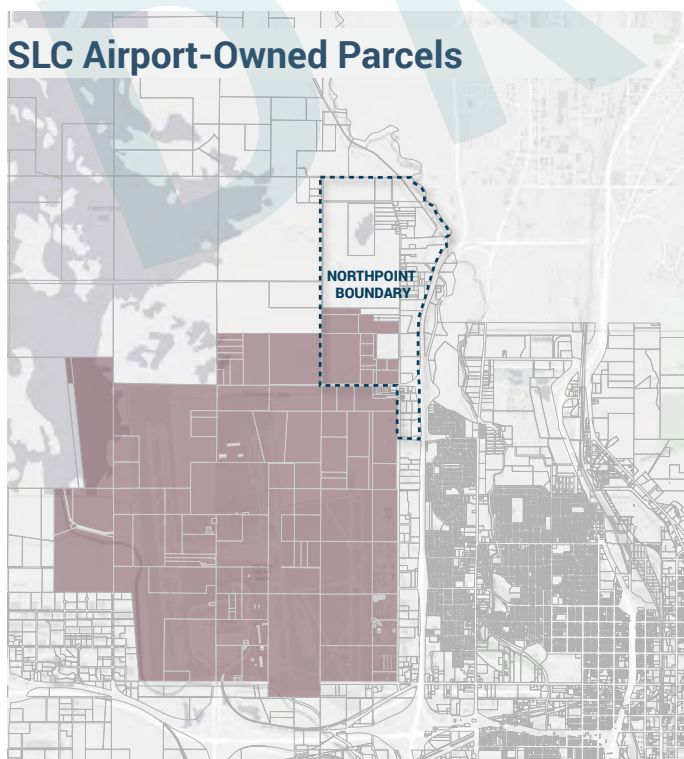
Graphic 1.10 | Water-Related Land Uses | Source: ESRI Living Atlas

Built Environment

Airport

The Salt Lake International Airport, located just south of the Plan Area, is one of the busiest airports in North America. The airport is also a major hub for Delta airlines and provides approximately 370 flights per day from its location. As the airport inherently produces high noise volumes and air quality issues, it has a significant impact on the surrounding areas and determining appropriate land uses in Northpoint.

The Salt Lake Airport recently adopted a new *Master Planing process*, the first since 1998, to provide guidelines for future airport development and to optimize existing facilities for future aviation demand and increase airport capacity. The resulting strategic vision illustrates locations for a third parallel runway and Concourse C which are not anticipated to be built within the next twenty years.



Graphic 1.11 | Parcels Owned by the Salt Lake City International Airport | Source: Assessors Parcel Data

The City has formally regulated the land uses surrounding the airport to protect the greater community and reduce negative impact. In 1971, zoning ordinances were adopted allowed within Northpoint and in 1983, the zoning ordinances were supplemented with regulations that prohibited incompatible uses like residential housing.

Development Constraints

Existing development within Northpoint experience consequences from their proximity to the airport and overhead flights. Some existing residences face increased risk for airplane crashes and high noise levels from the consistent flights. The Department of Airports recommends limiting the number of new residences allowed in Northpoint to reduce harm for the community in the future. The Federal Housing and Urban Development Department (HUD) does not provide any assistance, subsidy or insurance for projects located in Runway Clear Zones, Clear Zones and Accident Potential Zones. As a result, this Plan considers alternative uses within those zones.

The Salt Lake International Airport and Salt Lake City own several parcels surrounding the airport that were purchased to preserve as undeveloped. This, along with noise contours and influence zones limits development potential in the Plan Area.

Northpoint lies within Influence Zone A/B meaning, the aircraft noise from overhead flights can interfere with daily living activities including sleep, conversations and listening to media. The Federal Aviation Administration (FAA) requires that each airport study the noise impacts and create a Noise Compatibility Program associated with alleviating noise issues.

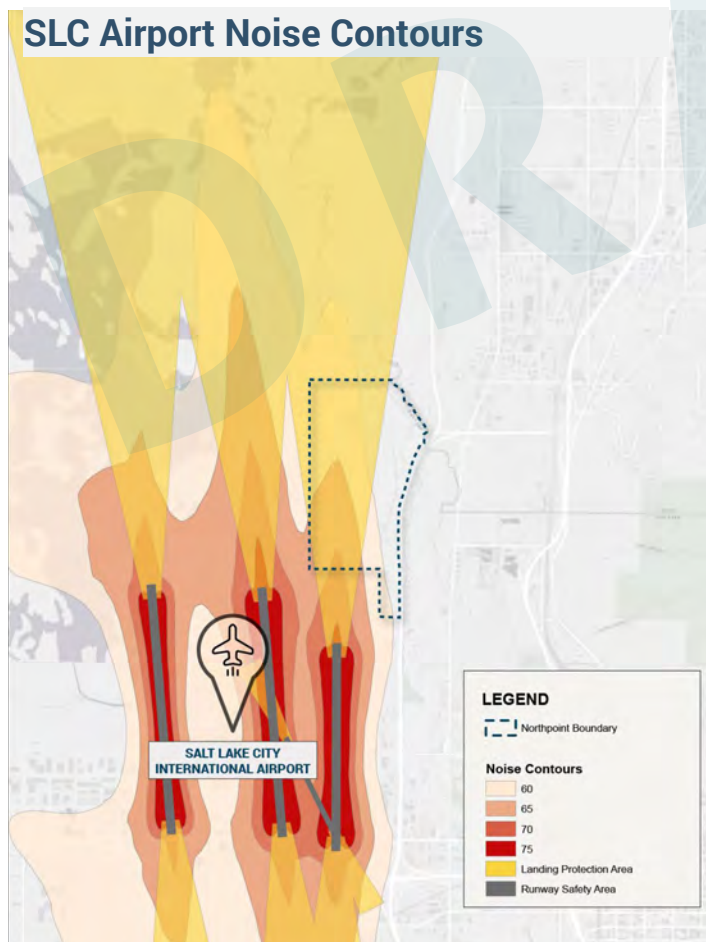
The Salt Lake City Noise Compatibility Program has implemented measures to increase compatibility with surrounding land uses

including maximization of flight times between 7am and 10pm. It has also implemented adjusted flight routes in pursuit of reduced disruption.

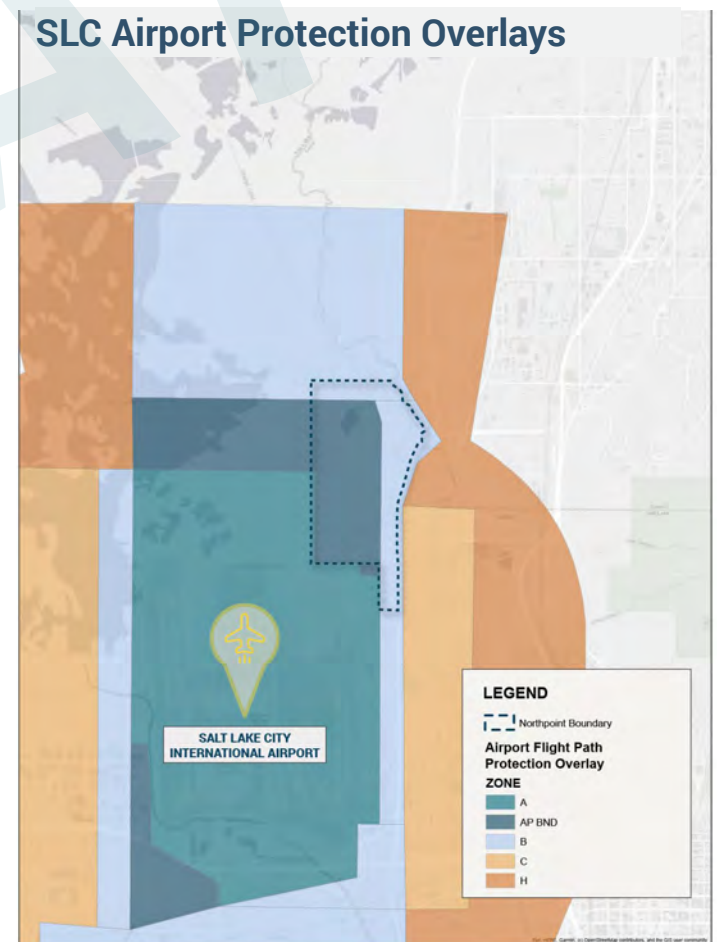
As residential uses should be limited in Northpoint because of these constraints, there are other uses and opportunities for development that are more compatible with the airport.

Economic Contribution

The Salt Lake City International Airport, is a key driver of the local and regional economy. Through protecting airport infrastructure and facilities from adjacent land uses that reduce or eliminate its ability to function at the highest capacity, the Salt Lake City International Airport can continue to act as an asset to the greater community.



Graphic 1.12 | SLC Airport Noise Contours | Source: SLC GIS Data



Graphic 1.13 | SLC Airport Overlays | Source: SLC GIS Data

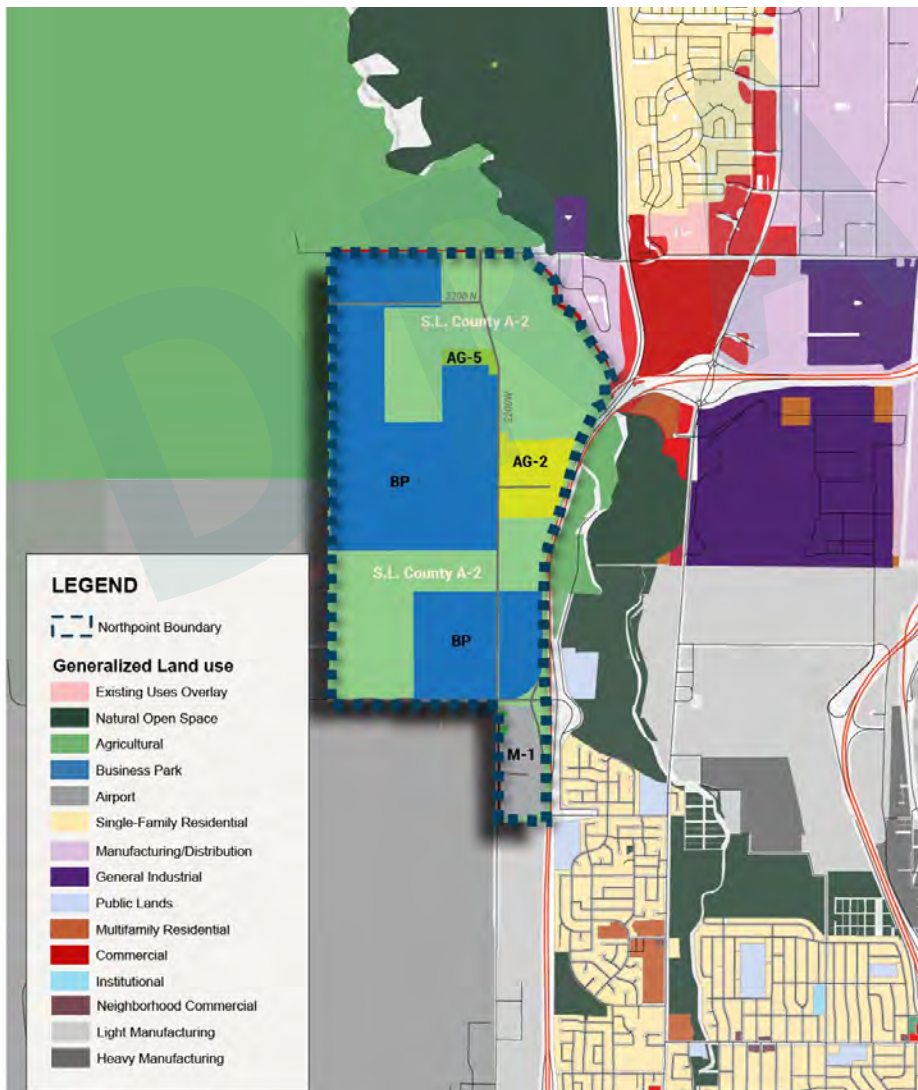
Land Use

Industrial and Business Uses

Within the Plan Area, there lies existing manufacturing zoning (M-1) that serves as a buffer between the airport and Interstate 215 (I-215). In July 2016, the City Council changed the zoning of properties located along 2200 W between 2100N and North Temple Street to Light Manufacturing (M-1) to implement area master plans and maximize economic development potential.

Light Manufacturing (M-1) allows for light industrial uses that produce little to no impact on neighboring properties and results in a clean, attractive industrial setting. This use is compatible with the adjacent airport and is less impacted by the negative aspects of nearby I-215 than residential uses. The M-1 designation allows more types of business than the Business Park (BP) designations. The more significant differences between the two zoning districts are related to open space and building location requirements. The BP designation requires 15% open space, while M-1 requires no open space. M-1 also has reduced setback requirements.

Approximately half of the Plan Area is designated BP. The intent of the BP designation is to provide an attractive environment for modern offices, light assembly and warehouse development, and to create employment and economic development opportunities in a campus-like setting.



Graphic 1.14 | SLC and SLCo Zoning | Source: SLC, SLCo, and North Salt Lake GIS Data

Agricultural and Residential Uses

The Plan Area contains several agricultural zones under both City and County jurisdiction, including Salt Lake City's (SLC) AG-5 and AG-2, and Salt Lake County's (SLCo) A-2 zone preserves agricultural uses on lots no less than two acres and, similarly, AG-5 provides for agricultural uses on no less than five acres. The A-2 zone allows for low-density residential and supporting agriculture as a conditional use, on a minimum lot size of one acre.

Zone	Minimum Lot Area	Front Setback	Primary Uses
M-1 (SLC)	10,000 sq.ft.	15 ft.	Light Manufacturing
BP (SLC)	20,000 sq.ft.	30 ft.	Business/ Office
AG-2 (SLC)	2 acres	30 ft.	Agriculture/ Single-Family
AG-5 (SLC)	5 acres	30 ft.	Agriculture/ Single-Family
A-2 (SLCo)	1 acre	30 ft.	Single-Family



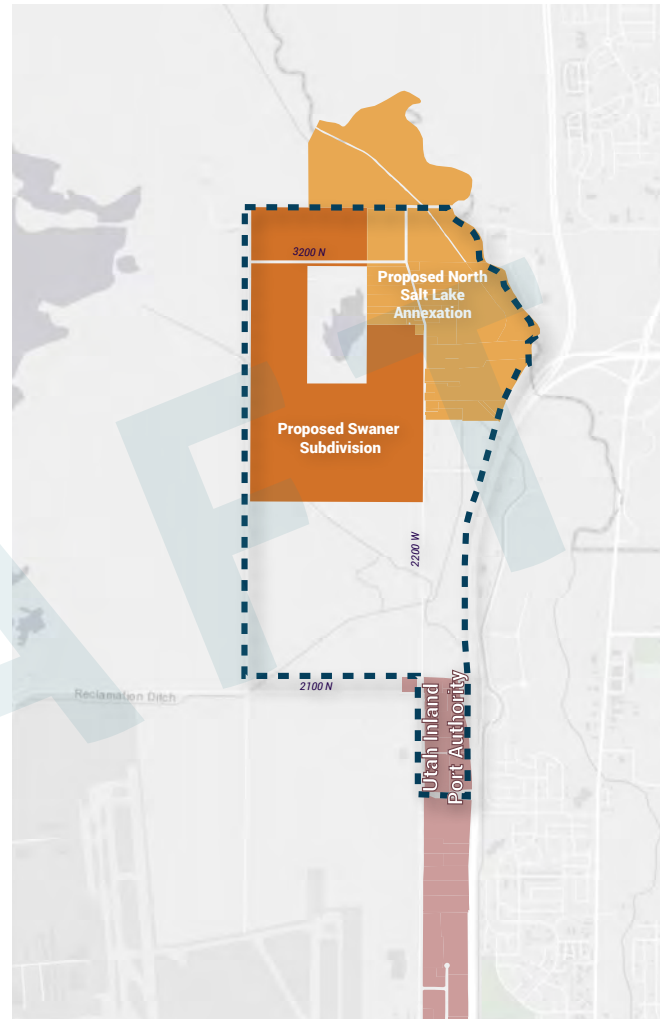
Graphic 1.15 | Residential in the Plan Area

Active Building Permits and Recent Development

There are currently a few active building permits within Northpoint that congregate along the 2200 W roadway and fall under the M-1 and BP zoning designations. A new development called Moonlake Farms has an active engineering permit and is among one of ten active permits for growing cannabis in Utah. There is also a new Industrial Building being built just north of the Sherman Williams. Along the 2100N roadway, two new multi-tenant warehouse building have active permits as well.

A key development proposal currently is the Swaner Subdivision, a 434-acre master planned development with about 5 million square feet of industrial on the C shaped parcel shown below currently zoned BP. This development would likely be cause for improvements on 2200 West to account for new increase in traffic.

Another major development conversation in this area is the Misty River annexation and proposed development. This proposed 350-acre annexation was initiated from the land owners, who wish to annex their land into North Salt Lake from Salt Lake County in order to preserve 220 acres for Cross E Ranch to continue functioning as a working farm and develop 125 acres into a residential planned community of nearly 1,000 new homes.



Graphic 1.16 | Active Applications

Utilities

Broadband

The Plan Area is serviced by a mix of fixed wireless and wireline (cable, dsl and fiber) broadband internet. Within the census tract that Northpoint occupies, 10.60% of households are without internet access. The companies serving the area are Centurylink for local exchange, Rocky Mountain Power for electric utility territory and Dominion Energy for natural gas. The Utah Broadband Plan adopted in January 2020 set a goal to "Utilize best practices to encourage continued expansion of broadband deployment and increase speeds for everyone to 25 Mbps or better in communities throughout Utah". The Plan Area currently has network speeds of 90.47/28.05 Mbps and its max advertised consumer download speeds are 10,000.00 Mbps.

Industrial Wastewater

The Salt Lake City Corporation's pretreatment program oversees industrial wastewater discharged into the City's sanitary sewer system. Industrial wastewater treatment, to reduce or eliminate conventional and toxic pollutants, prior to discharge into the POTW (publicly owned treatment works) is required and regulated under the Clean Water Act.

Salt Lake City is also undergoing redevelopment of its Water Reclamation Facility. The wastewater system will address new regulation from the Environmental Protection Agency (EPA) and Utah's Department of Water Quality to reduce pollution and transform aging infrastructures. The Water Reclamation Center is located about a mile to the east of Northpoint and is replacing the old structure, which was 55 years old.

Service Areas

The Salt Lake City Public Utilities service area covers most of Northpoint with the exception of a portion to the north, just south of the Jordan River and a portion on the southern boundary. The remaining area is considered unincorporated territory. Though there are few sewer lines to this area, development is encroaching from the southeast and slowly extending utilities with it. Many residential and agricultural properties in this area rely on septic sewer systems.

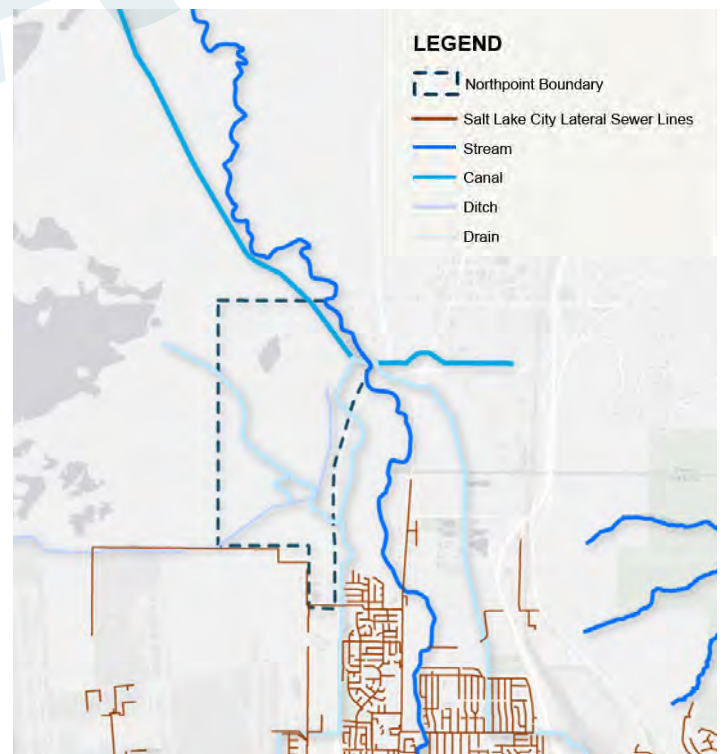
Street Lighting

Public Utilities within Salt Lake manages and maintains more than 15,000 street lights, including those in Northpoint. The few residences and commercial customers within the area support street lighting through a monthly user fee, included in the bill for drinking water, wastewater, stormwater and sanitation services.

The initial capital improvement program for street lighting in 2012 included a metric of converting the City's entire inventory to high-energy efficiency LED lamps by the end of 2021. The continuous lighting maps do not extend into the Plan Area likely due to the lack of development in the area and the irregular Salt Lake City boundary.

Irrigation Canals

There are several irrigation canals running through Northpoint that serve the greater Salt Lake City area. The Rudy Drain runs diagonally across the study area from its connection to the Greater Salt Lake in the upper northwest quadrant to the lower southeast quadrant. Running along the western boundary is the Salt Lake City Canal Sewage. The southern boundary has a Reclamation ditch just north of the international airport.



Graphic 1.17 | Utilities in Northpoint | Source: SLC GIS Data

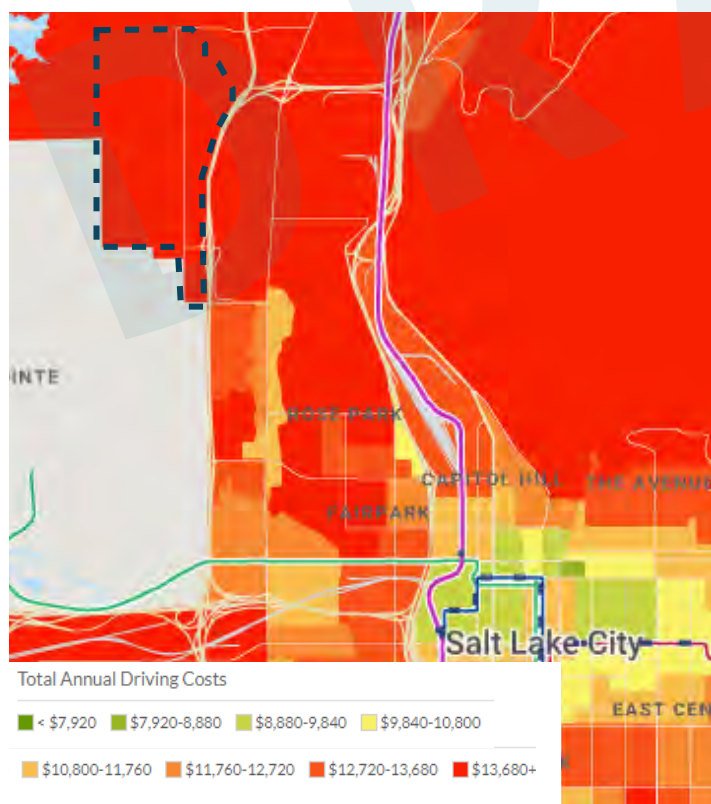
accessible within a 15-minute walk of current homes of businesses within Northpoint.

Bike Accessibility

The major bikeways extending through the Plan Area are the Jordan River Trail, Parkway Trail, and a bike lane along 2200 W and 2100N. The bikeways along 2200 W and 2100N are designated medium comfort by Bike SLC. The painted bike lane disappears as the surroundings become more rural moving northbound through the Plan Area. These routes do not have high traffic but bikers must share the roads with vehicles in the same lanes.

Economic Impact of Transportation

Limited access to public transportation and the barrier of I-215 require households in the Plan Area to rely on personal vehicles or rideshare options to commute to and from work, errands, and schools. The Center for Neighborhood Technology recommends a household spend no more than 15% of their annual income on transportation. For a regional-typical household in this area, that means no more than \$9,329. Households in this census block spend an average of \$16,167- 175% higher than this benchmark. This is also higher than the Salt Lake City average of \$13,211.



Graphic 1.19 | Annual Driving Costs per Household | Source: Center for Neighborhood Technology



Graphic 1.20 | Utah Transit Authority Bus

Northpoint Community

Demographics

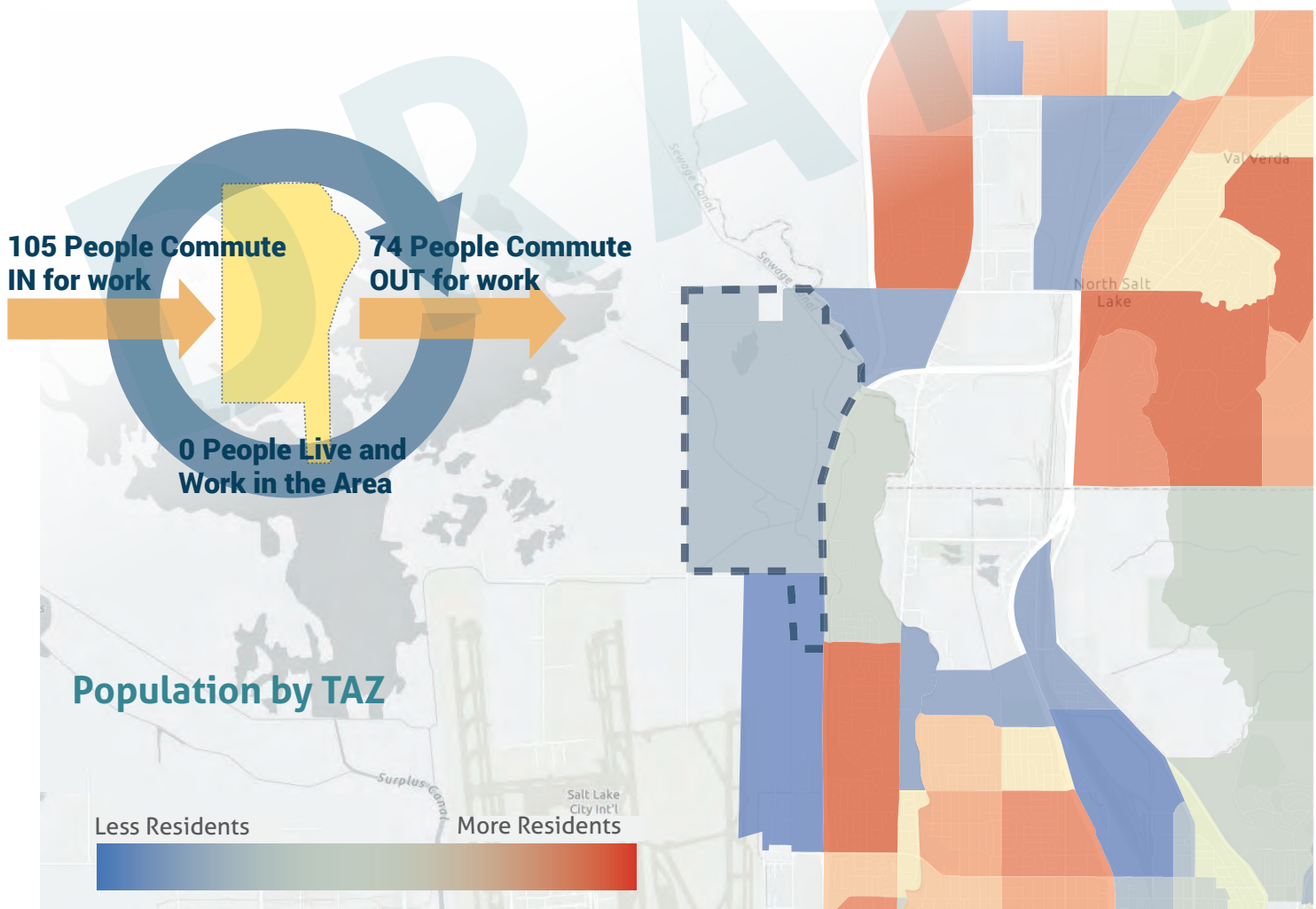
Over the last decade, Salt Lake City has grown by roughly 14,000 new residents. Most of this growth has been concentrated in downtown Salt Lake City, Central City, and Sugarhouse, each of which grew by over 2,000 residents between 2010 and 2020. Northpoint falls within the Westpointe Community Council area, which saw a population decrease (-1.6%) over the last decade.

Approximately 140 people live within the Plan Area in roughly 60 households. City Council District 1, which encompasses the Plan Area boasts the largest share of Hispanic or Latino Population (48%) of all Council Districts.

Economy

105 people are employed within the Plan Area but live elsewhere, and 74 Northpoint residents commute out of the area for work. No residents both live and work within the Plan Area.

Of the jobs within the Plan Area boundary, Wholesale Trade (30% of the jobs) and Transportation and Warehousing (22%) are the most common industries. In 2018, about 54% of those jobs within the Plan Area boundary provided less than \$40,000 per year in salary, roughly 63% of the median household income for overall Salt Lake City residents at \$63,971.



Graphic 1.21 | Commuting Patterns and Population | Source: U.S. Census 2019

Within and immediately outside of the Plan Area, major employers include the Salt Lake City International Airport, Amazon, and the Salt Lake Mosquito Abatement Center.

Those who live in the Plan Area have a higher median household income than the City as a whole at \$75,791 and tend to work in the service industry, transportation and utilities, or manufacturing.

Housing

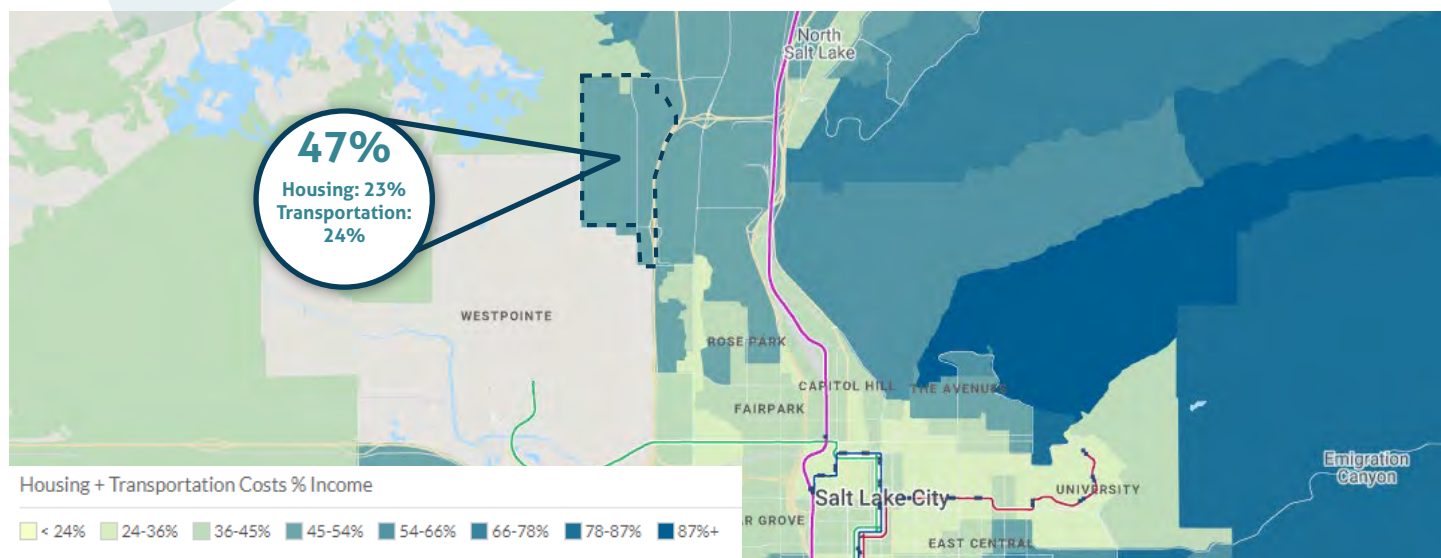
There are about 60 homes within the Plan Area and 1,487 housing units in the associated census tract. Housing is concentrated east of 2200 W due to environmental constraints and airport impacts. Housing within the Plan Area is comprised entirely single-family housing units, some of which are agricultural properties.

The Plan Area has a high rate of owner-occupied units at 85.4% and an average home value of \$438,000. This is higher than the median price for the zip code as a whole at \$346,900. The zip code saw a 24% increase in home prices between 2020 and 2021.

The Center for Neighborhood Technology estimates that households within the Plan Area are spending on average, 47% of their income on housing and transportation costs every month. As Salt Lake County grows and expands west, combining housing and transportation costs into one number offers an expanded view of affordability by showing the impacts of a longer daily commute on the affordability of a community. The Center for Neighborhood Technology sets a housing and transportation spending benchmark of no more than 45% of a household's income, rather than using the traditional rule of no more than 30% on housing alone.

Funding the Future

Salt Lake City Council approved a 0.5% sales tax increase in May 2018. This increase will typically generate about \$34 million a year in ongoing funding and is the first part of a funding strategy to address street conditions, affordable housing, public transit, and neighborhood safety. The Plan Area could benefit from funding for an affordable housing program and increased neighborhood safety.

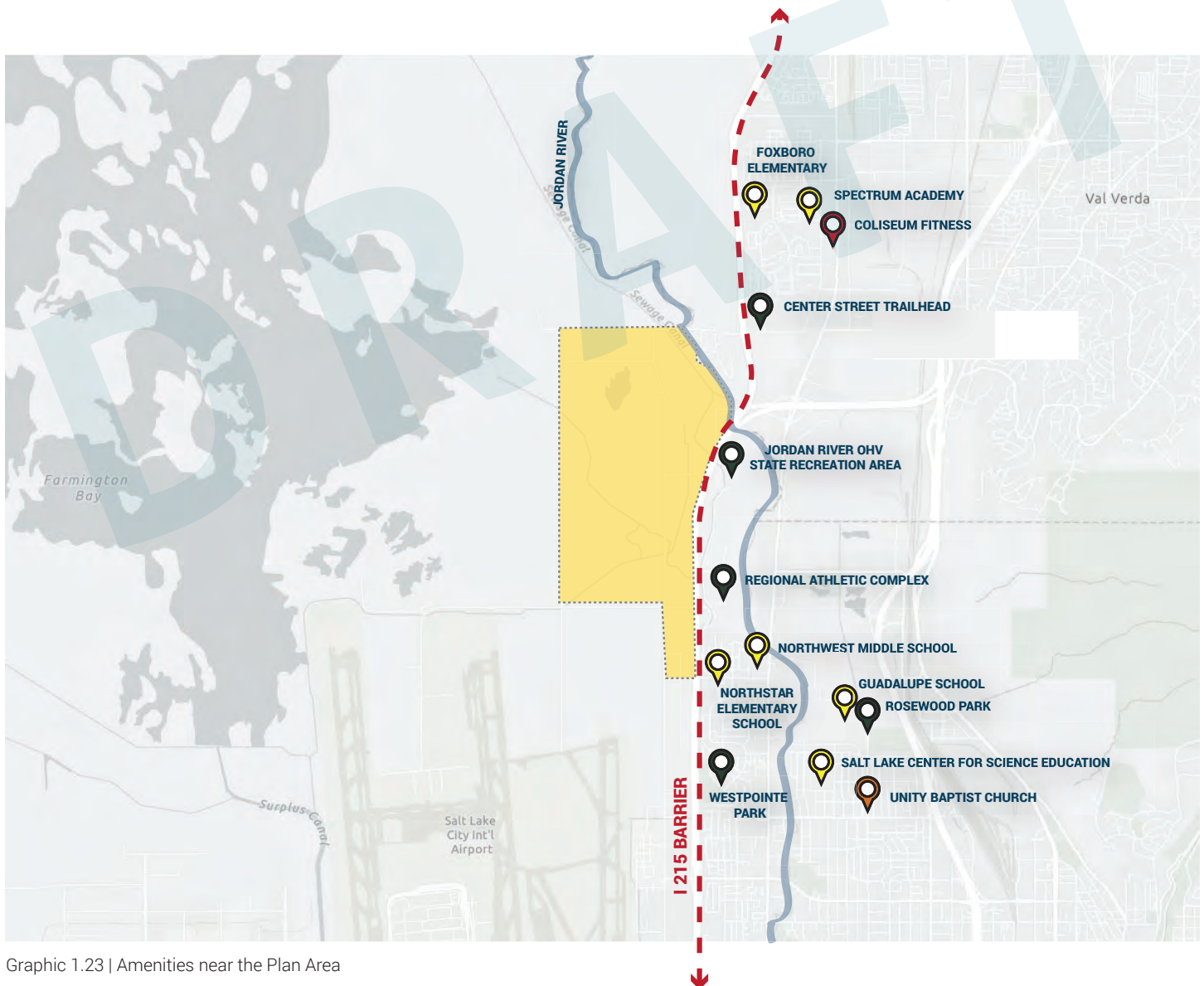


Graphic 1.22 | Housing and Transportation Costs as Percent of Income Per Household | Source: Center for Neighborhood Technology

Community Amenities

The Plan Area is bordered by the Jordan River connecting Utah Lake to the Great Salt Lake, and passing through three counties. Many sections of the Jordan River have access trails running parallel to the river and connect nearby parks. Although the Plan Area lies adjacent to the River, the formal trail stops to the east of I-215. Directly east of the Plan Area are the Regional Athletic Complex, Jordan River OHV State Recreation Area, Westpointe Park,

Northstar Elementary School, and Northwest Middle School. Only one crossing of I-215 allows for access to these areas. As shown below, I-215 severely limits access to community resources like schools, religious organizations, recreation, and other gathering areas.



Graphic 1.23 | Amenities near the Plan Area



Graphic 1.24 | Trailhead map of the Jordan River





APPENDIX B

PUBLIC INPUT

Appendix B: Public Input

The public input process included various opportunities for engagement. One-on-one interviews with residents, developers, environmental groups, and city and county staff were conducted throughout the summer of 2021. Over 30 people attended a public open house in the spring of 2022, and two public questionnaires and a property owner-specific questionnaire were distributed over the course of the Northpoint Small Area project.









The following is a record of the engagement and materials from the open house and survey results.

Open House and Questionnaire Comments

PLANNING 2200 WEST

Please indicate your visual preferences by placing a sticker on the pictures!

What amenities would you like to see as this road redevelops?

What else?

CONSERVATION PRIORITIES











STRONGLY OPPOSE ← NEUTRAL → STRONGLY SUPPORT

Category	Item	Preference
Regulatory Tools	Special Standards and Design Guidelines	Strongly Support
	Sensitive Landscape Studies	Strongly Support
	Targeted Zoning Changes	Strongly Oppose
	Development Code Updates	Strongly Support
Incentive-Based Tools	Clustering of Lots and Open Space	Strongly Support
	Conservation Easements	Strongly Support
	Purchase of Development Rights (PDR)	Strongly Oppose
	Transfer of Development Rights (TDR)	Strongly Support
Acquisition Tools	Preferred Development Sites	Neutral
	Lease	Neutral
	Mutual Covenant	Neutral
	Land Banking	Strongly Oppose
	Land Exchange	Strongly Support

BUSINESS AND INDUSTRIAL DEVELOPMENT

Please indicate your visual preferences by placing a sticker on the pictures!

What design elements are appropriate for new business and industrial development in this area?

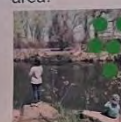







What else?

Further industrial in this area will further degrade air quality in the valley

INTERACTION WITH THE WETLANDS

Please indicate your visual preference by placing a sticker on the pictures!

What open space interaction elements would you like to see in this area?

What else?

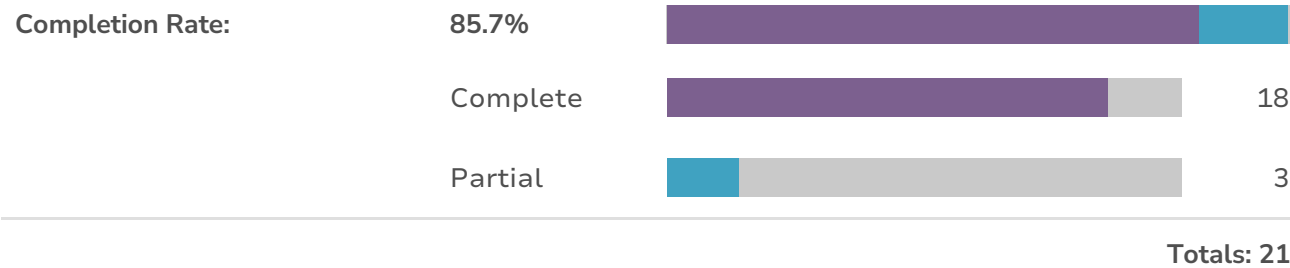
Wetlands are a vital part of the ecosystem and should be protected. Any development should be carefully planned to avoid disturbing the wetlands.

GENERAL COMMENTS

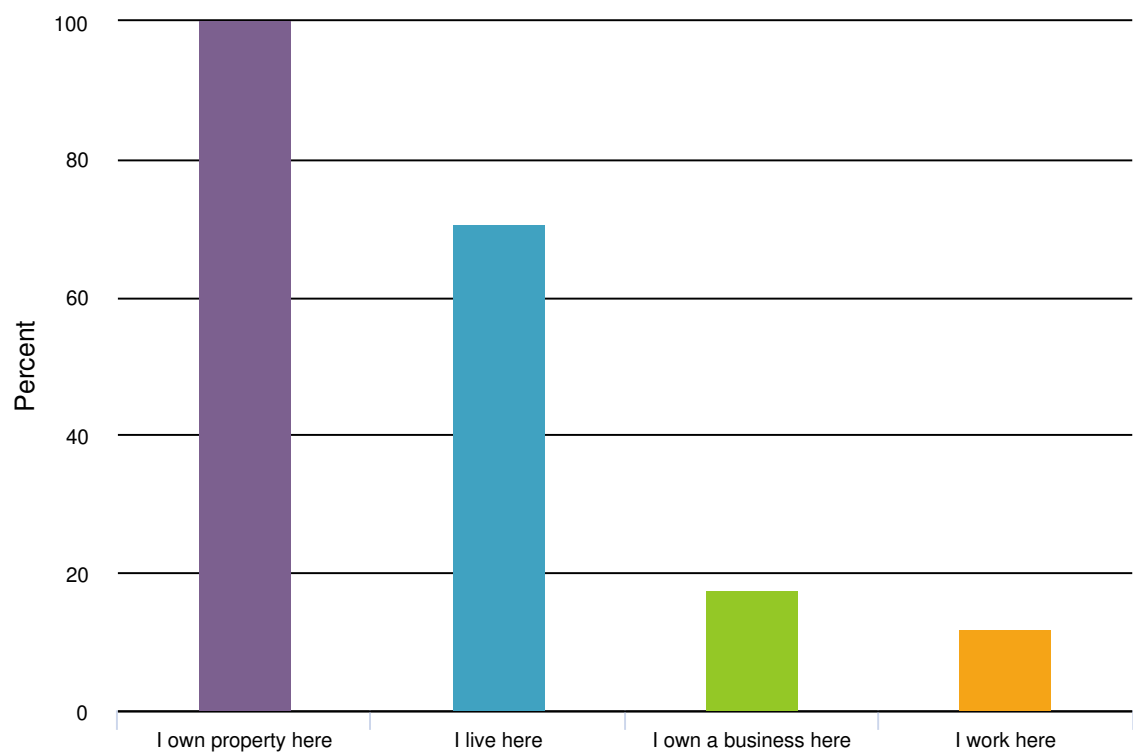


Report for Northpoint Property Owner Questionnaire

Response Counts

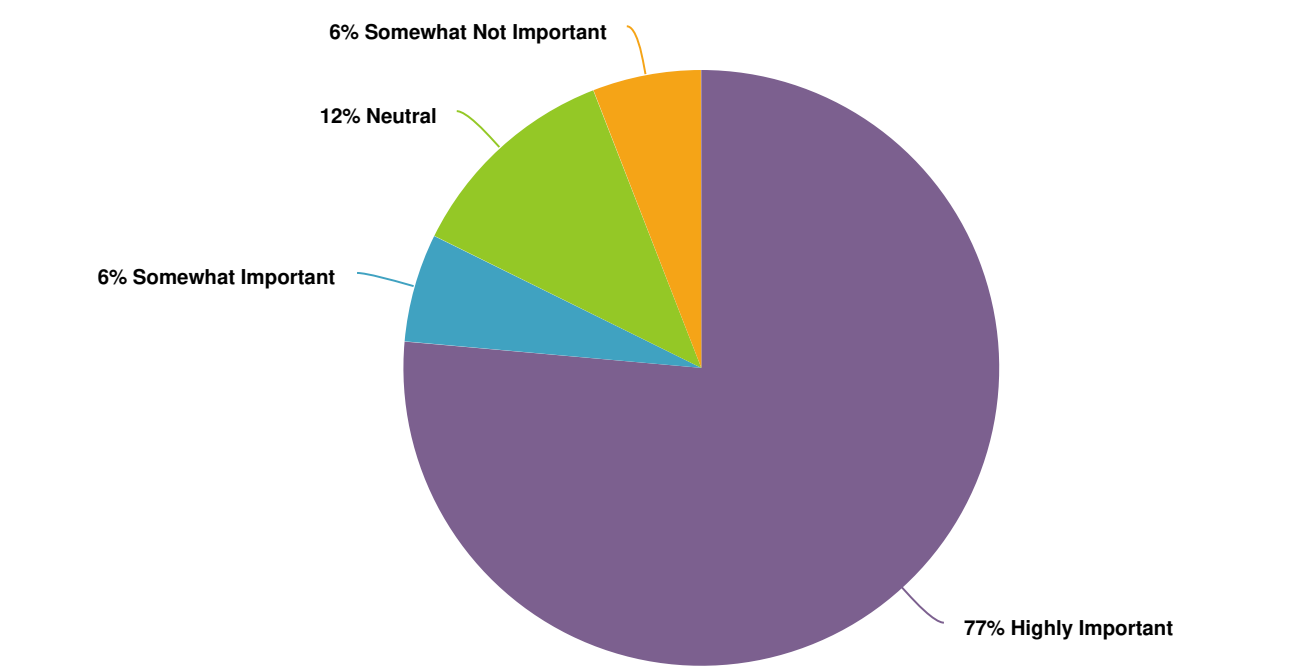


1. What is your relationship with the Northpoint area? (select all that apply)



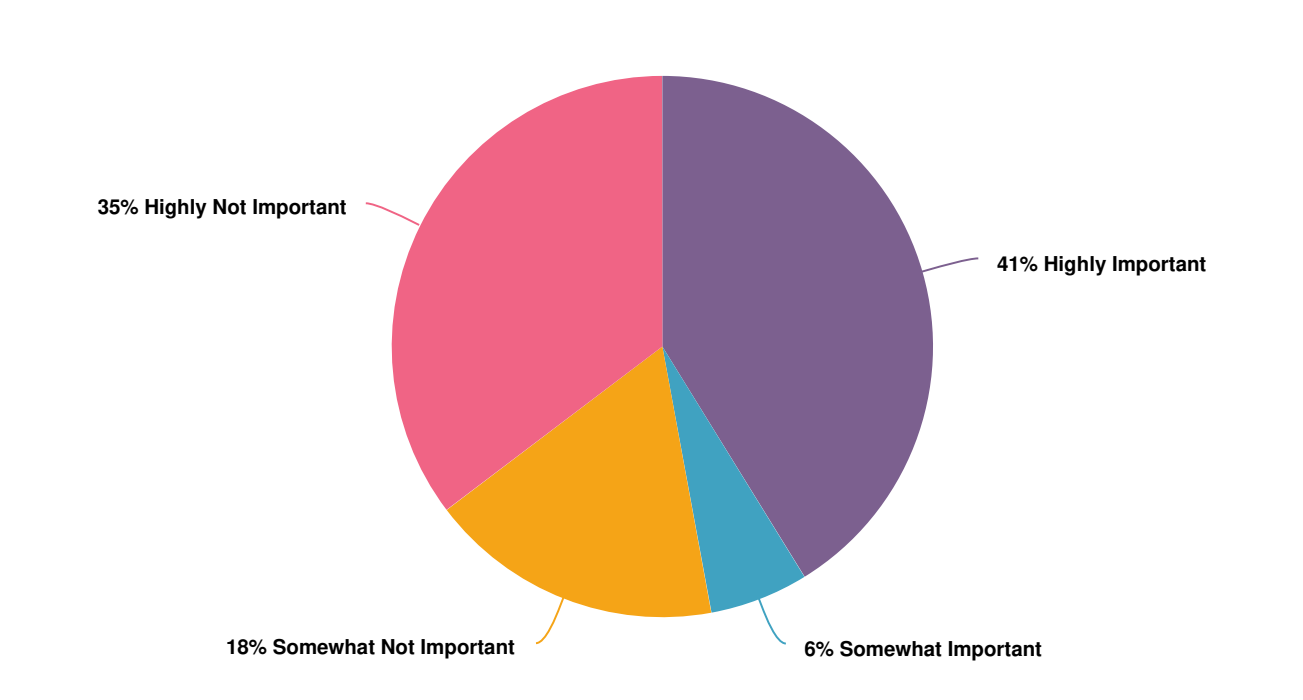
Value		Percent	Responses
I own property here	<div></div>	100.0%	17
I live here	<div></div>	70.6%	12
I own a business here	<div></div>	17.6%	3
I work here	<div></div>	11.8%	2

2. In the Northpoint area how important is the conservation of habitat and ecosystems to you?



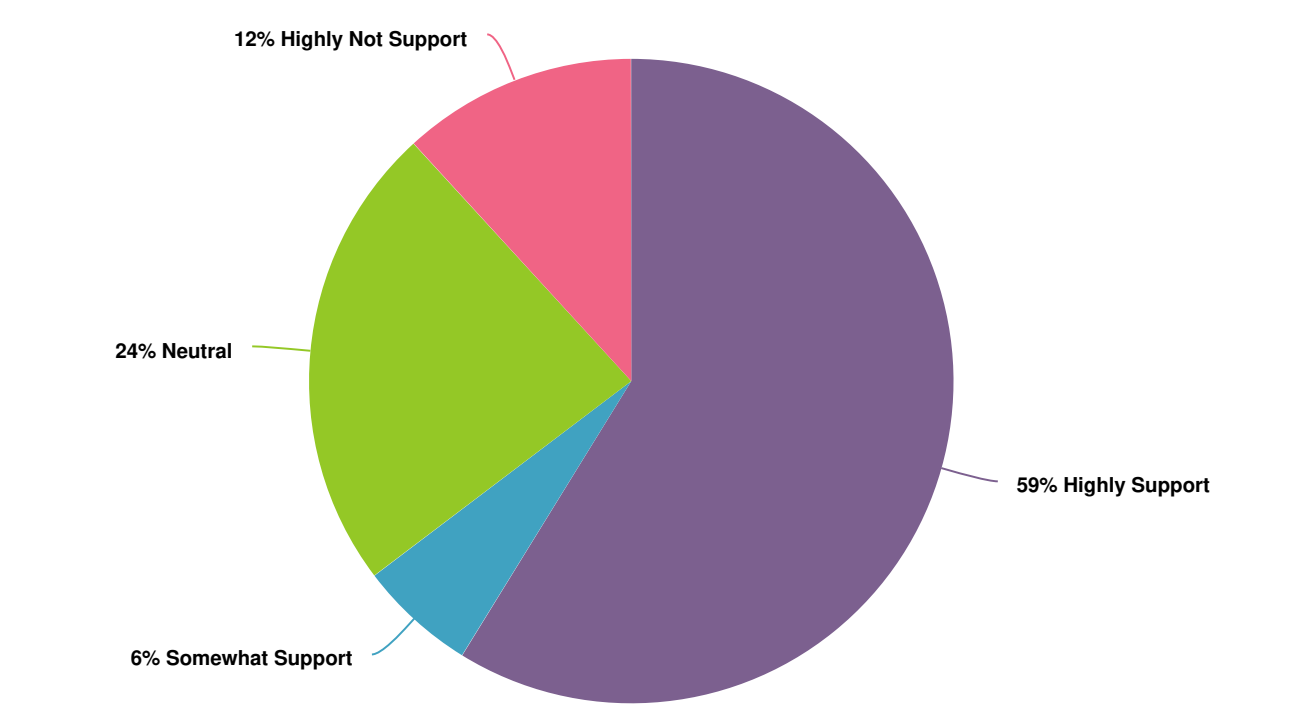
Value		Percent	Responses
Highly Important	<div><div></div></div>	76.5%	13
Somewhat Important	<div><div></div></div>	5.9%	1
Neutral	<div><div></div></div>	11.8%	2
Somewhat Not Important	<div><div></div></div>	5.9%	1
Totals: 17			

3. In the Northpoint area how important is commercial and residential development to you?



Value		Percent	Responses
Highly Important	<div><div></div><div></div></div>	41.2%	7
Somewhat Important	<div><div></div><div></div></div>	5.9%	1
Somewhat Not Important	<div><div></div><div></div></div>	17.6%	3
Highly Not Important	<div><div></div><div></div></div>	35.3%	6
Totals: 17			

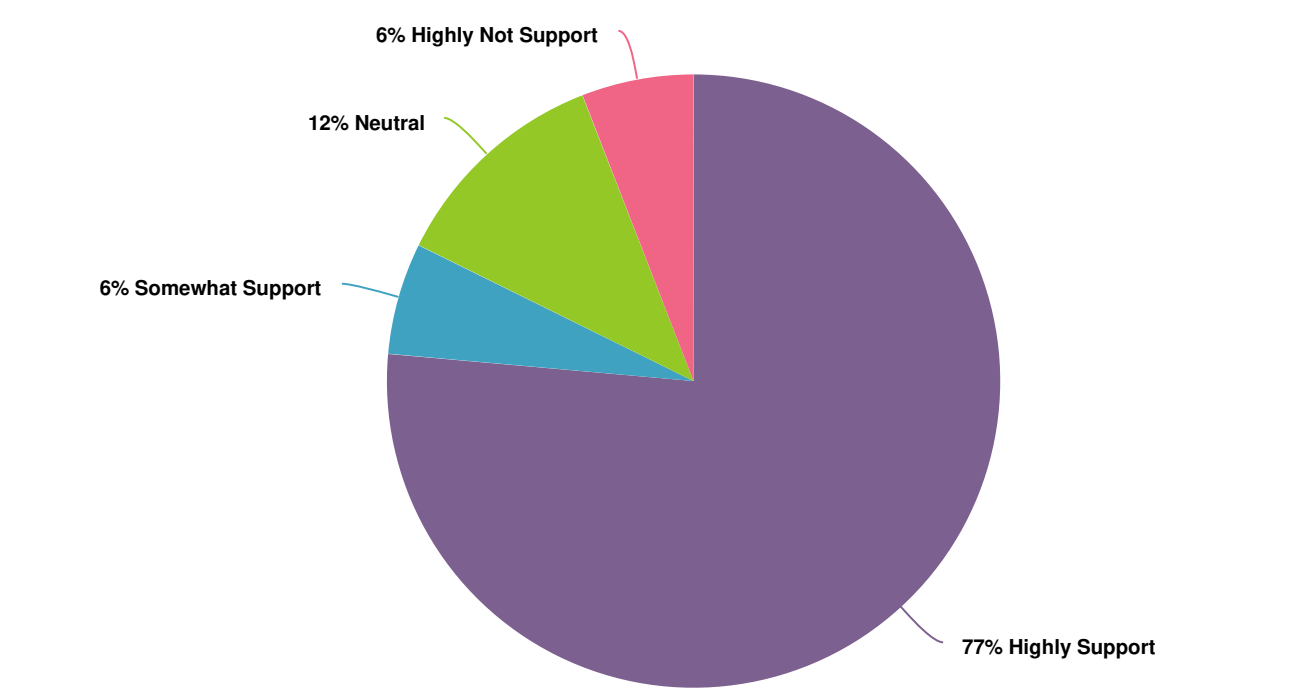
4. Would you support conservation methods and tools that could provide financial compensation to landowners for the preservation of natural lands and habitats instead of development?



Value		Percent	Responses
Highly Support	<div><div></div></div>	58.8%	10
Somewhat Support	<div><div></div></div>	5.9%	1
Neutral	<div><div></div></div>	23.5%	4
Highly Not Support	<div><div></div></div>	11.8%	2

Totals: 17

5. Would you support the continuation of existing land uses such as grazing, agriculture, habitat conservation, rural residential, and wildlife?



Value		Percent	Responses
Highly Support	<div><div></div></div>	76.5%	13
Somewhat Support	<div><div></div></div>	5.9%	1
Neutral	<div><div></div></div>	11.8%	2
Highly Not Support	<div><div></div></div>	5.9%	1

Totals: 17

6. Is there anything you'd like to add?

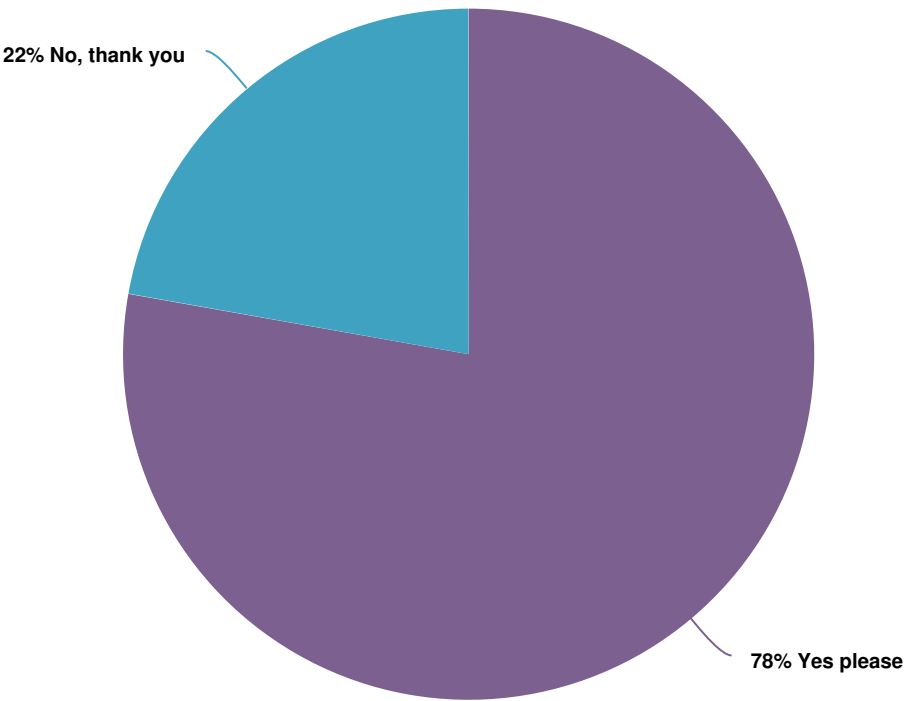
ResponseID	Response
4	No.
7	I am highly against any further building on the agricultural land out here.
8	The area is too close to the airport not to take advantage of this proximity to lessen the burden on existing infrastructure and lessen pollution. This can be done preserving habitat closer to the Great Salt Lake.
10	We need clean air and less big heavy trucks in this tiny road. We can't handle it. We pay our taxes just like everyone eon the east side we deserve more from the city.
13	Just because land in the area has always been zoned Business Park, it does not mean it should stay that way. I don't see how it was ever zoned BP or anything other than conservation when it is directly next to ecosystems that will be negatively impacted by development. I appreciate you asking for our opinions and for keeping the survey short, but I am somewhat disappointed in this survey as it feels lacking. It's not ideal to ask double barreled questions in surveys if you want honest answers. For example, my answer to supporting residential development is different than my answer to commercial development, but this survey can't reflect that.
14	I operate a recording studio off of 2200w and construction of anything will shut me down during construction and possibly forever.
15	Construction on 2200w is dangerous without some sort of alternate construction road in place before construction begins.
16	The area of 2200 west to 3200 west and 2100 north to 3300 north is a bird and wildlife refuge and one of the last open spaces in SL county. It needs to be preserved and not just overdeveloped like the rest of the valley is becoming. Thank you for your time. Robert Taylor
17	It would be the advantage of the area and ecology to think about NOT developing every lat inch of open space. This is a sensitive area. There is a high saturation of wildlife, migration and nesting areas here. It's a wetland. In a meet the committee was surprised to hear about the existence of wildlife. We see and experience it everyday. The delineation of preexisting residential areas should be recognized. This area was settled by ranchers and farmers who understood the doom of development. This area is a treasure and should be left alone OR very thoughtfully and carefully developed. The rate with which it is occurring now is always met with contempt and disagreement. There is another way and we should make a plan of best outcomes.

ResponseID Response

20 I think the area can do both commercial and have some open space.. This area is not for residential? My opinion. I have seen residential next to airports and it's not nice at all..

21 My family has been here for over 100 years. A lot of the older homes were built by family. Now with the restrictions of building and septic use. You can't let your children build a house on a 1/4 acre lot. I have had to have children move to wood cross to have there own home. The current restrictions render the ground useless for building anything. Yet keeping some space still for AG use. The bigger lots have all ready been sold to developers, the people left will be left with your open space weed patch and no money to move any where.

7. Are you interested in receiving further information about this project and ways to get involved?

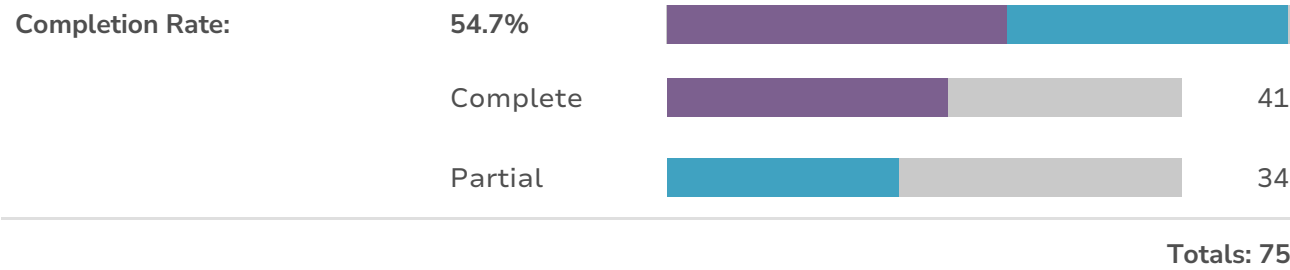


Value		Percent	Responses
Yes please	<div><div></div></div>	77.8%	14
No, thank you	<div><div></div></div>	22.2%	4

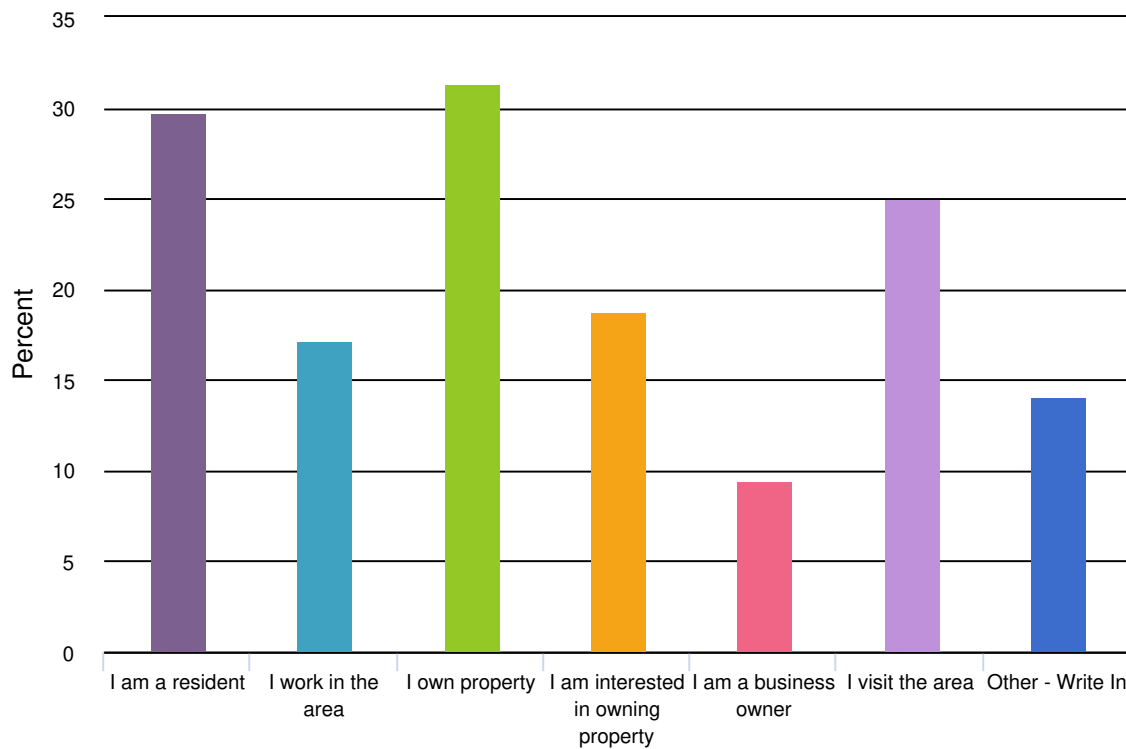
Totals: 18








Report for Northpoint Small Area Plan Questionnaire

Response Counts

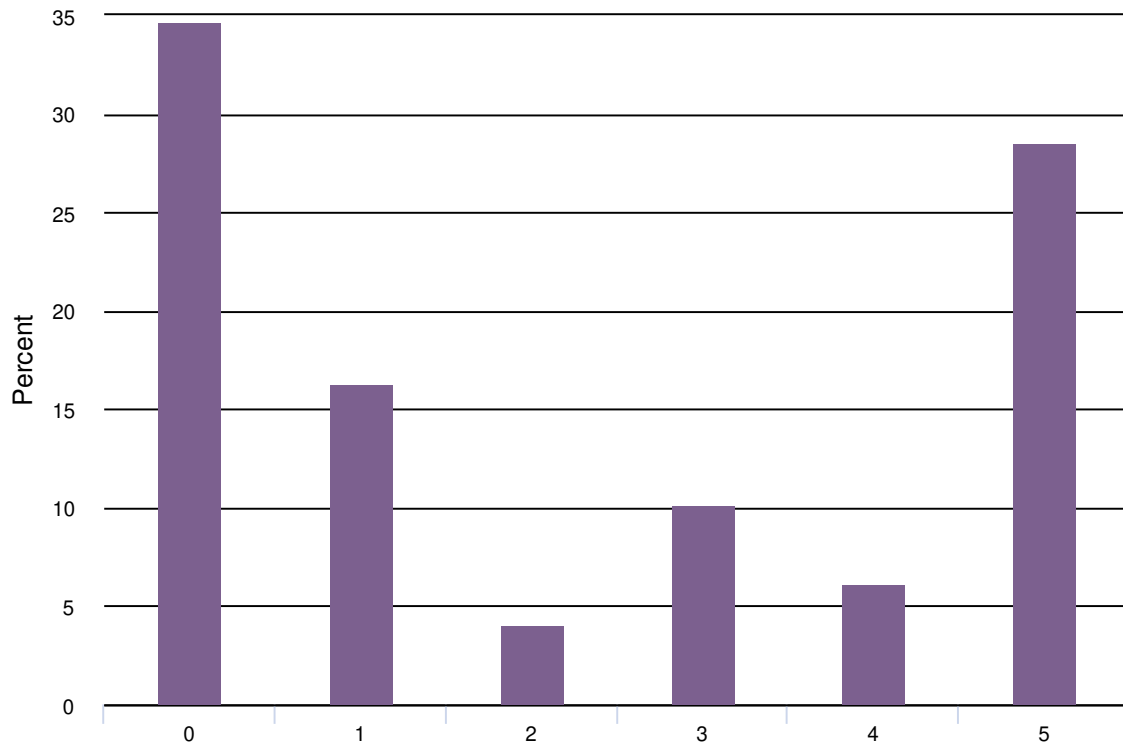


1. What is your affiliation with the Northpoint area?

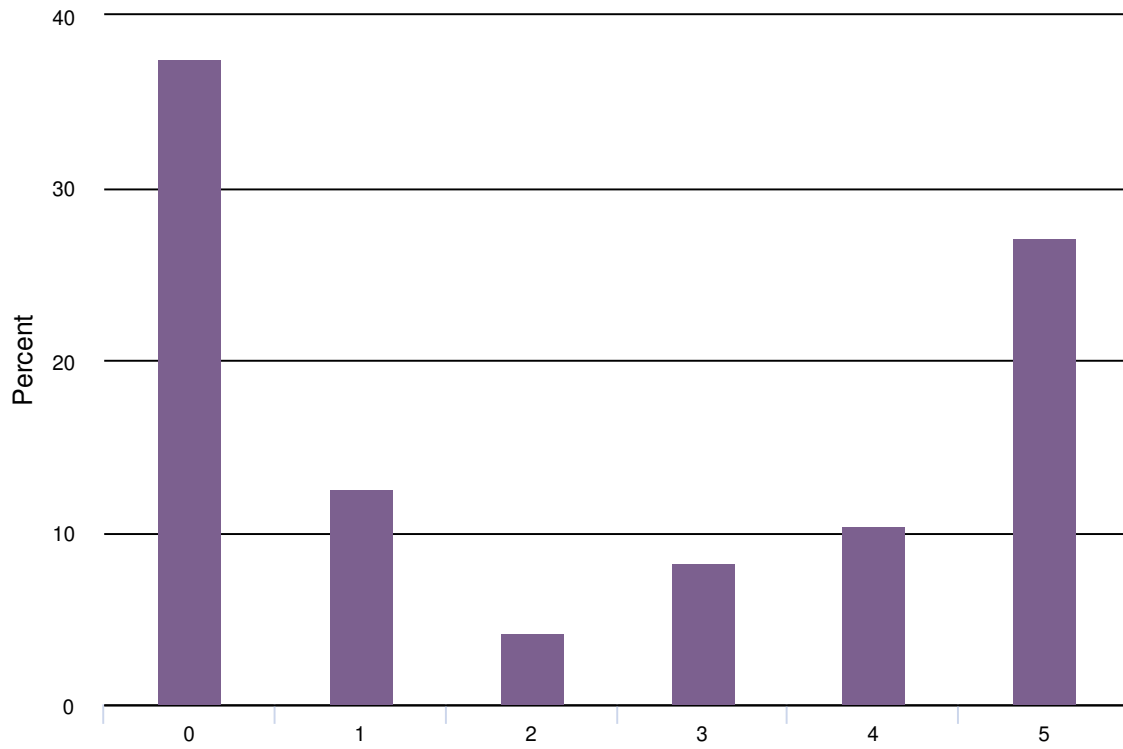


Value		Percent	Responses
I am a resident		29.7%	19
I work in the area		17.2%	11
I own property		31.3%	20
I am interested in owning property		18.8%	12
I am a business owner		9.4%	6
I visit the area		25.0%	16
Other - Write In		14.1%	9

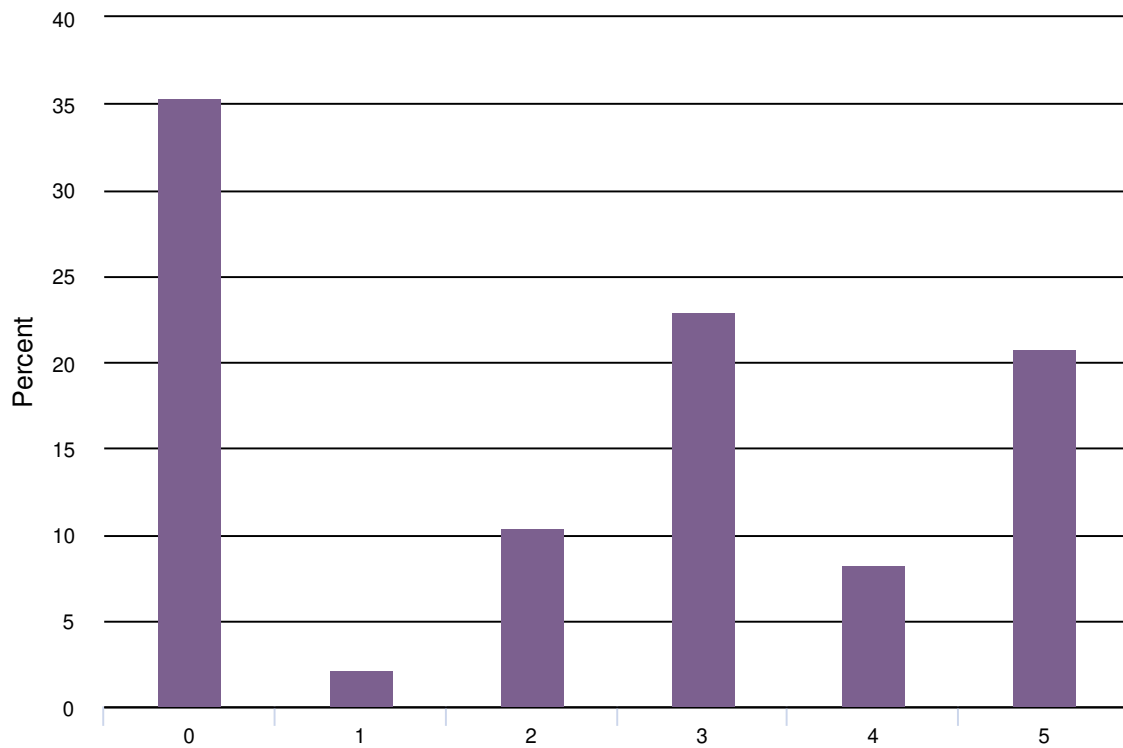
2. What is your level of support for special standards and design guidelines as a regulatory conservation tool?



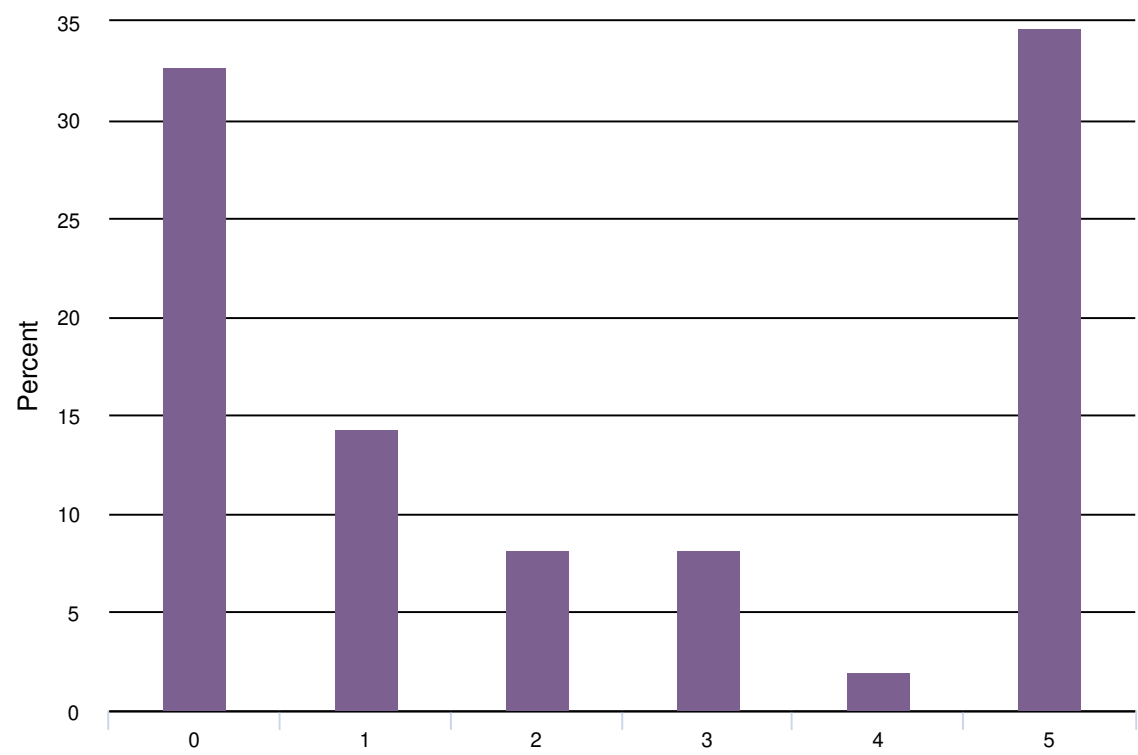
3. What is your level of support for requiring sensitive landscape studies as a regulatory conservation tool?



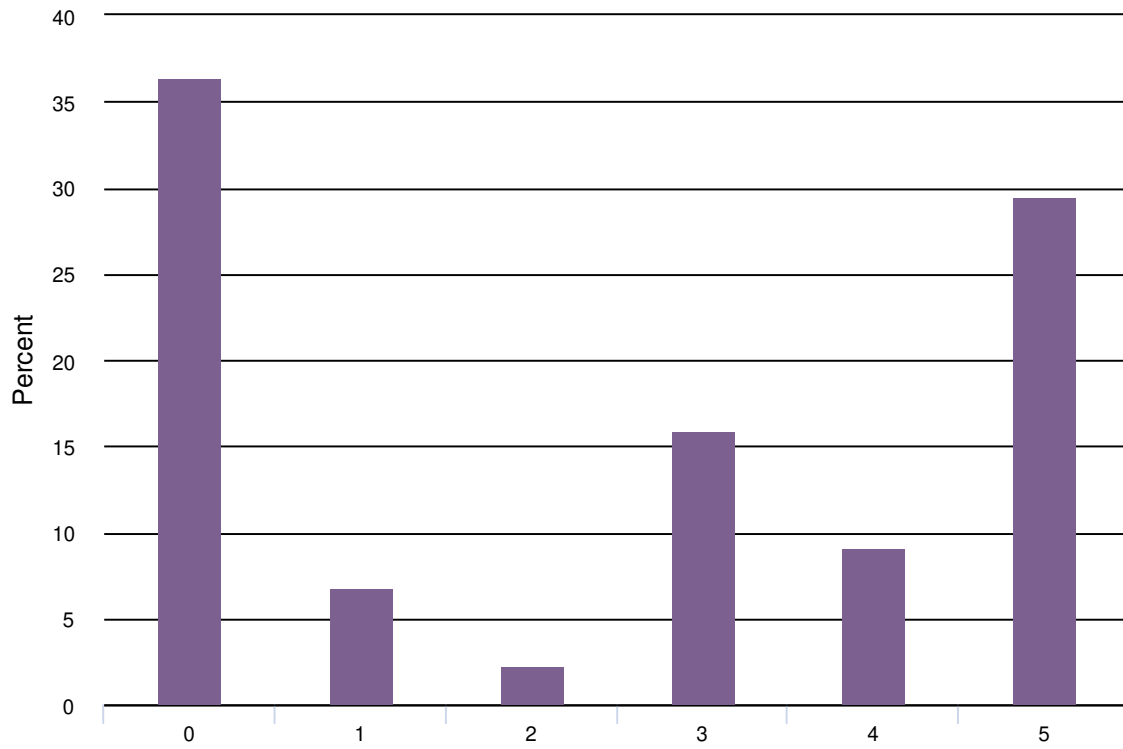
4. What is your level of support for development code updates as a regulatory conservation tool?



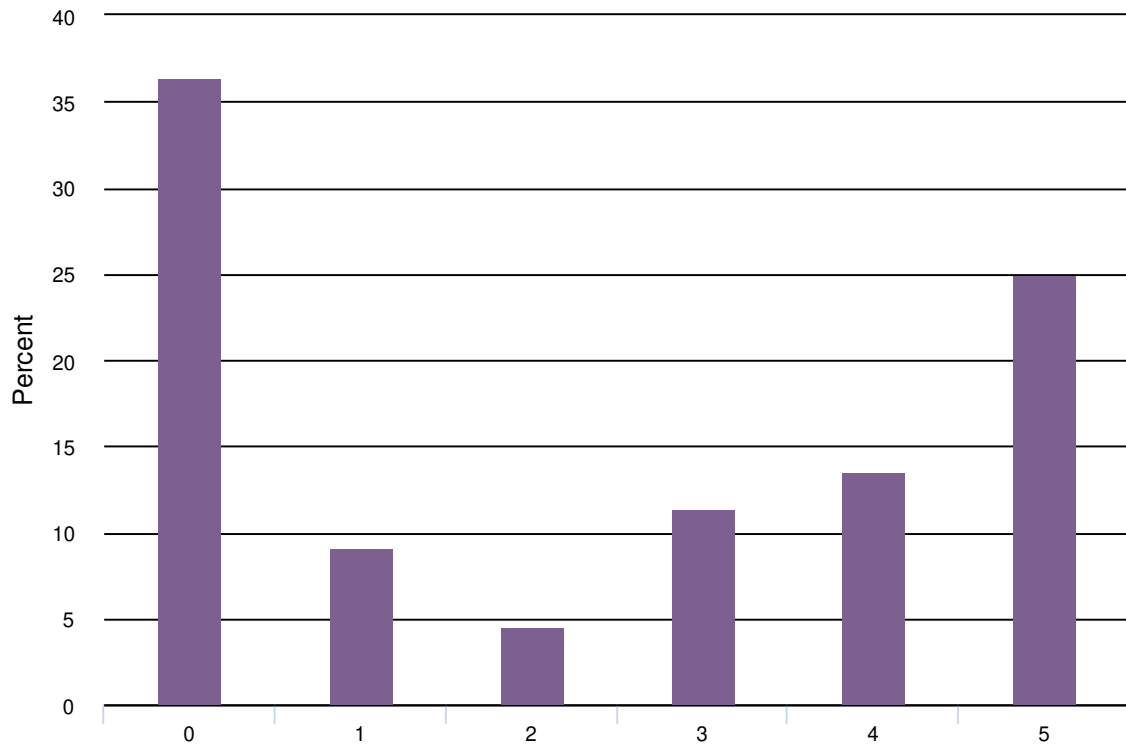
5. What is your level of support for the clustering of lots and open space as a regulatory conservation tool?



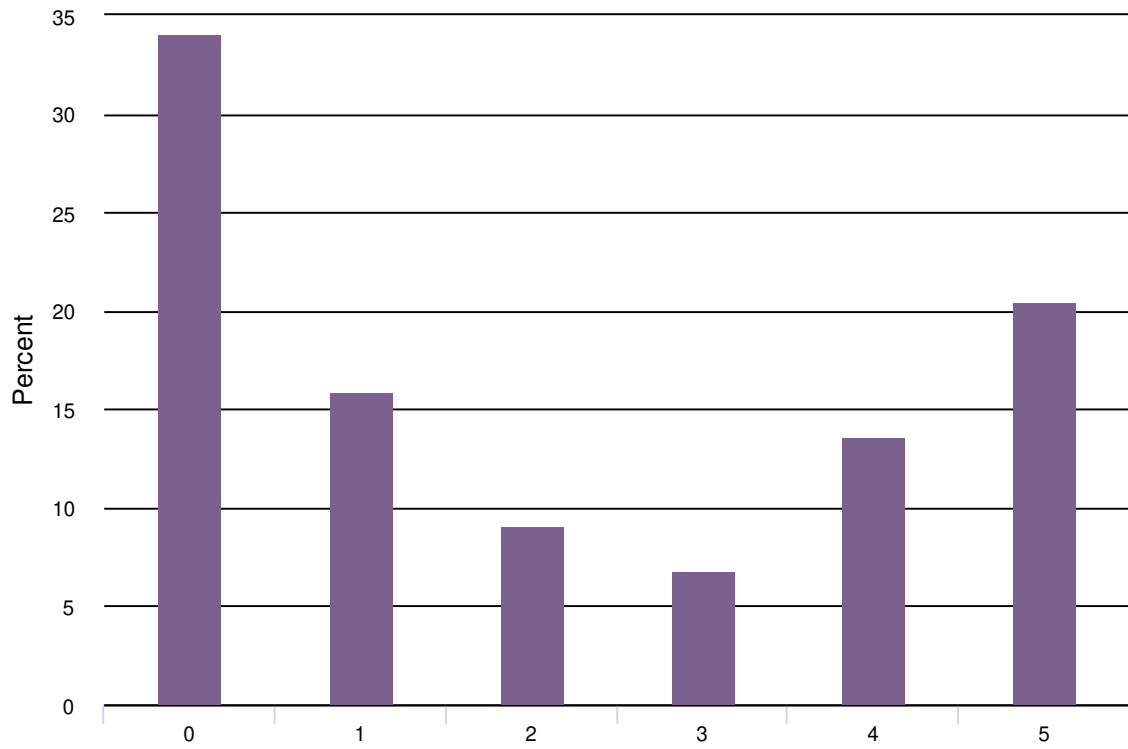
6. What is your level of support for conservation easements as an incentive-based conservation tool?



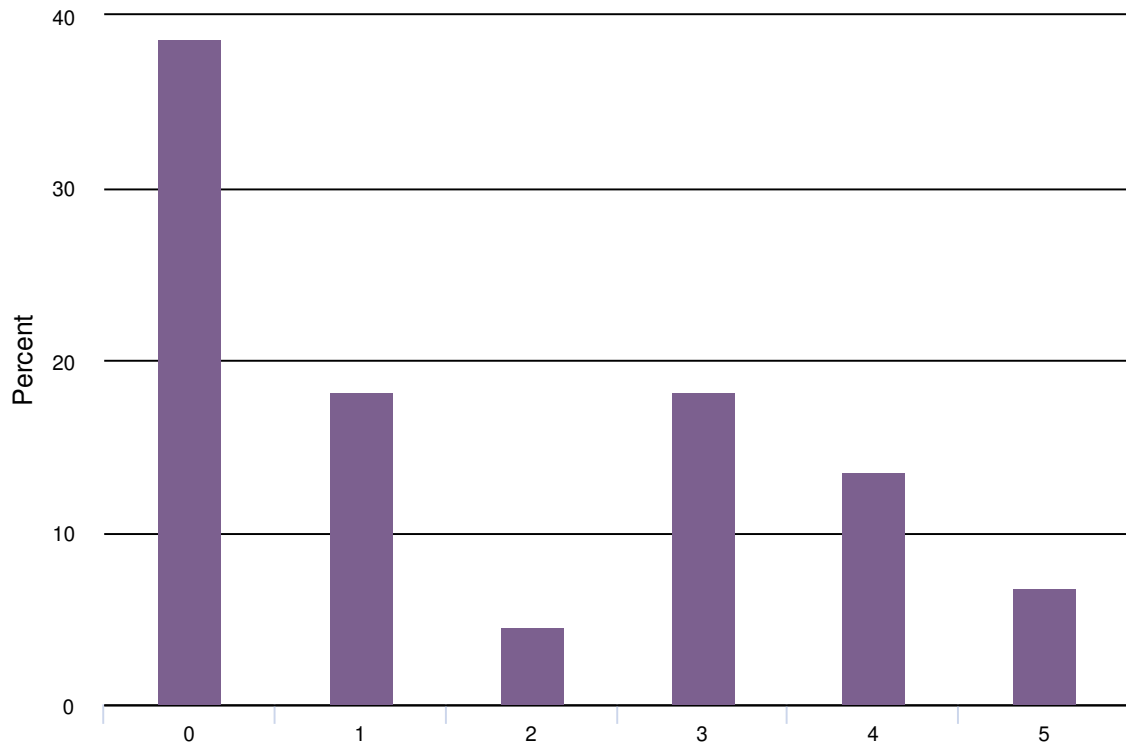
7. What is your level of support for purchase of development rights (PDR) as an incentive-based conservation tool?



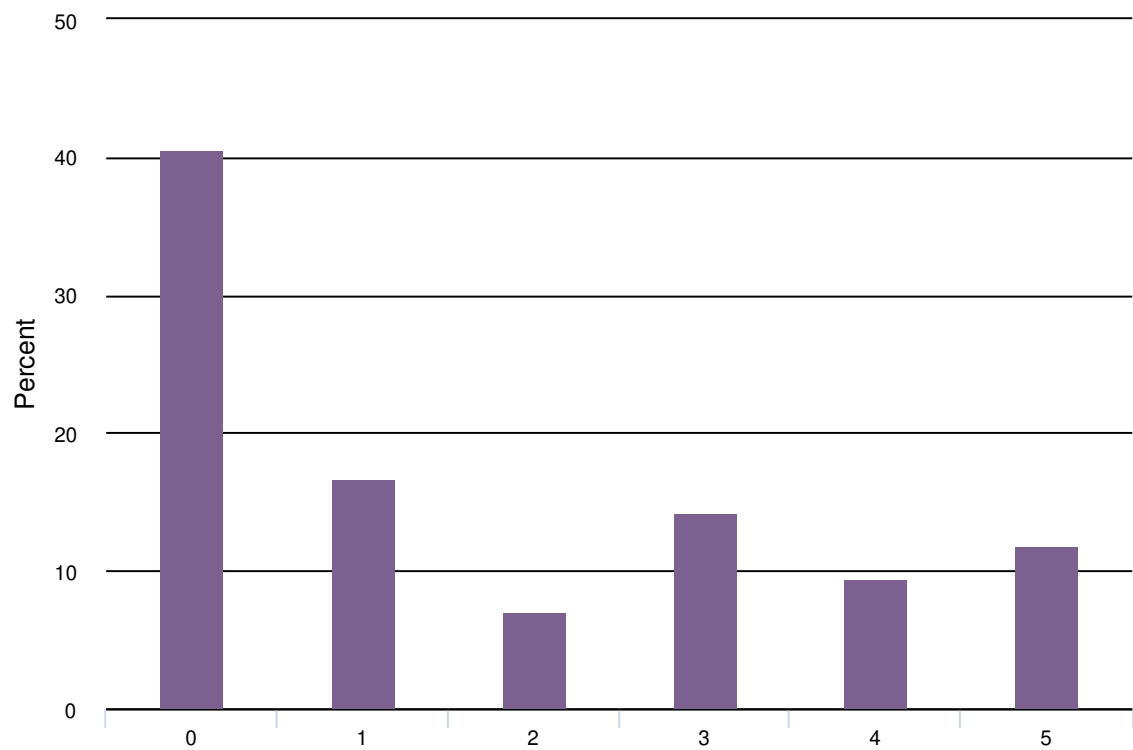
8. What is your level of support for transfer of development rights as an incentive-based conservation tool?



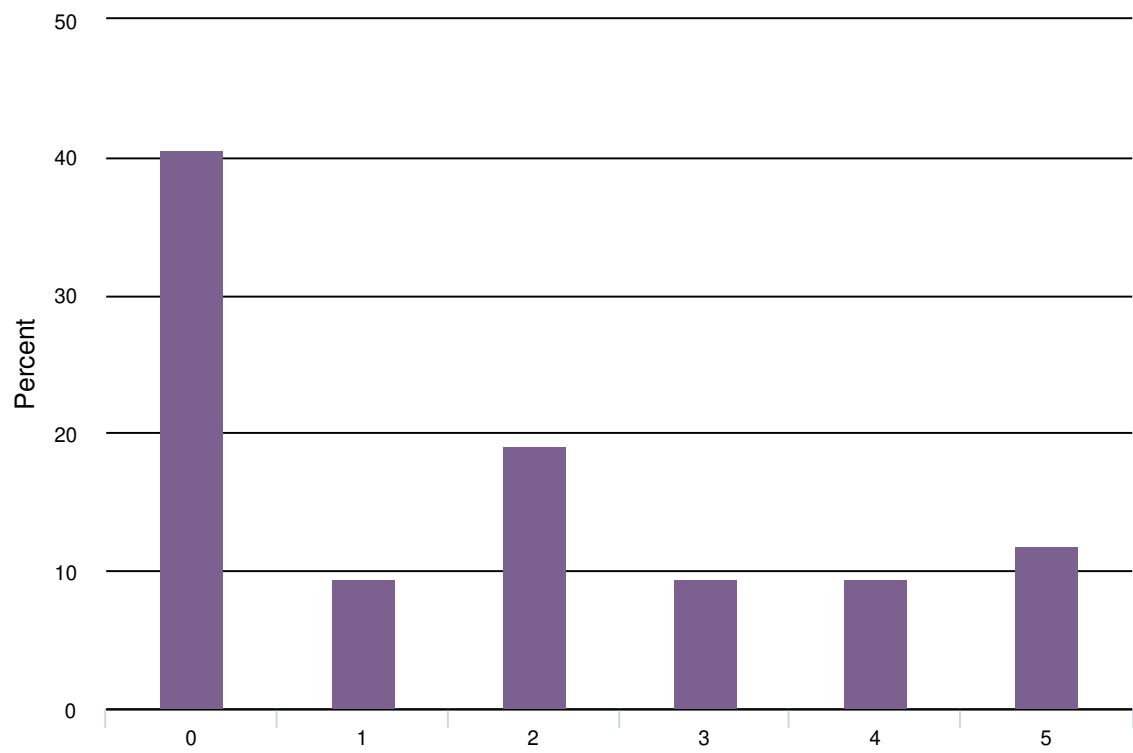
9. What is your level of support for preferred development sites as an incentive-based conservation tool?



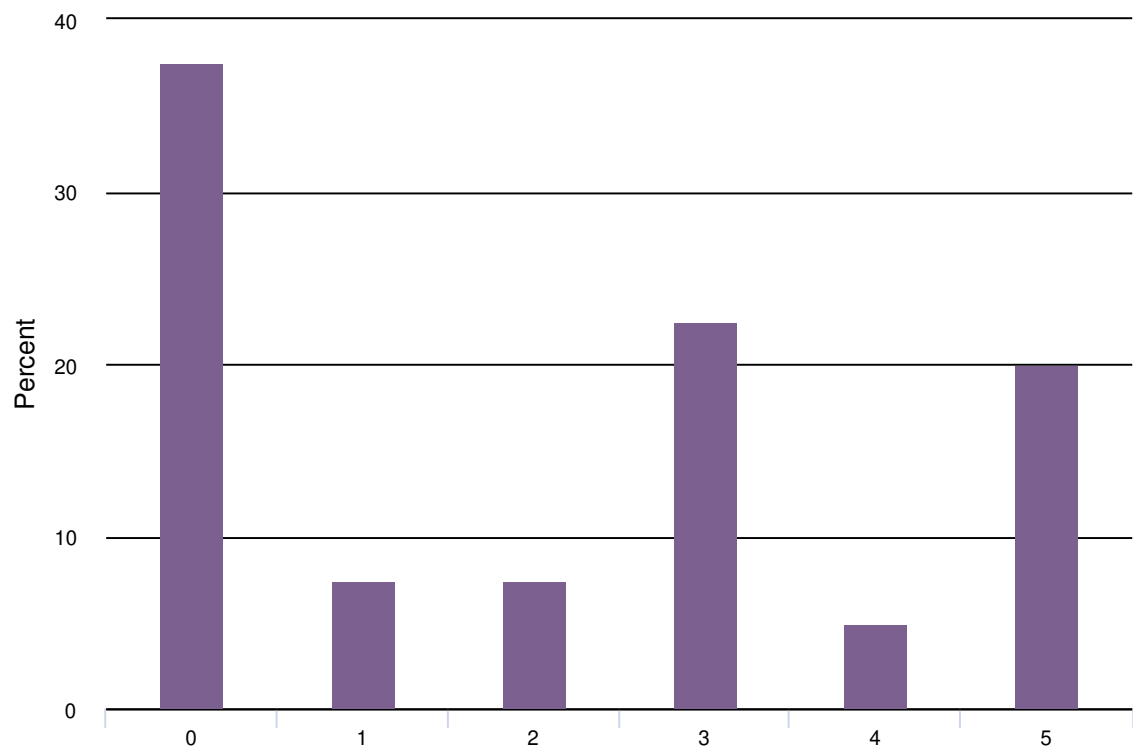
10. What is your level of support for lease agreements as a land acquisition conservation tool?



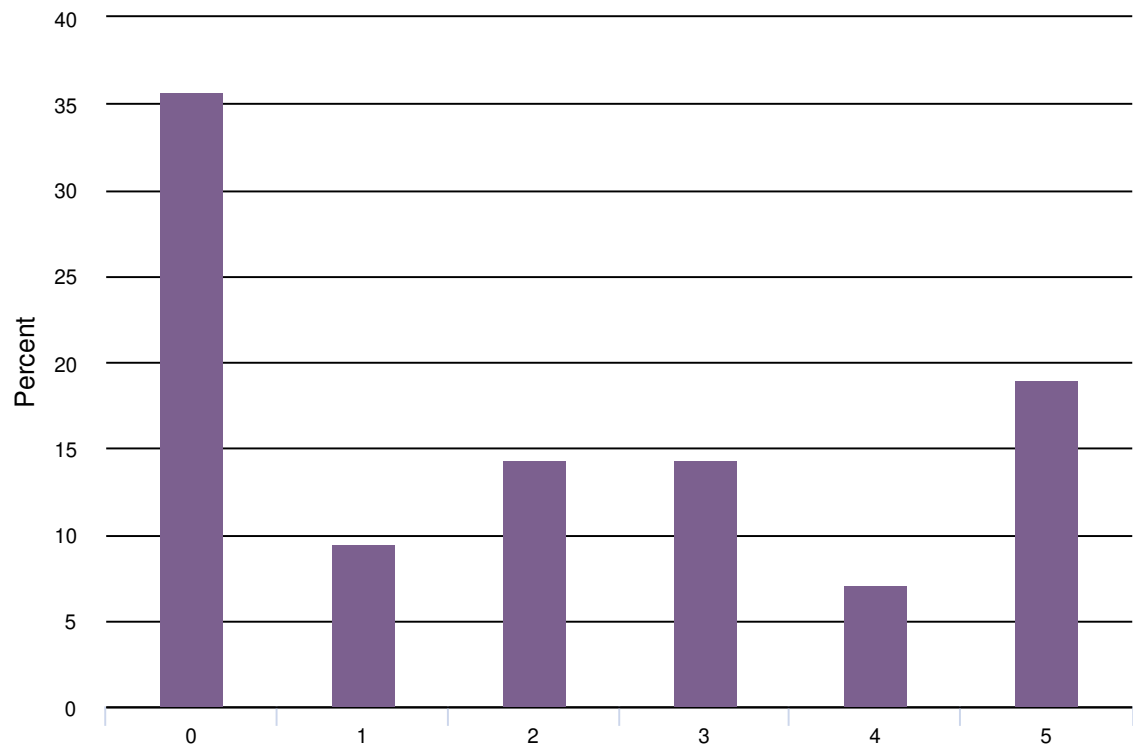
11. What is your level of support for mutual covenants as a land acquisition conservation tool?



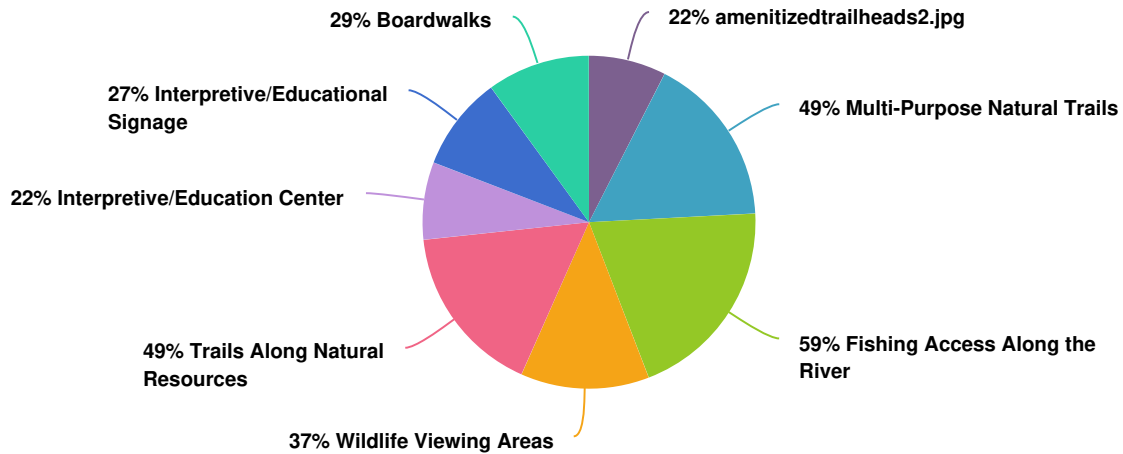
12. What is your level of support for land banking as a land acquisition conservation tool?











13. What is your level of support for land exchange as a land acquisition conservation tool?



14. What open space interaction elements would you like to see in the Northpoint Area? (select all that apply)



Value		Percent	Responses
amenitizedtrailheads2.jpg		22.0%	9
Multi-Purpose Natural Trails		48.8%	20
Fishing Access Along the River		58.5%	24
Wildlife Viewing Areas		36.6%	15
Trails Along Natural Resources		48.8%	20
Interpretive/Education Center		22.0%	9
Interpretive/Educational Signage		26.8%	11
Boardwalks		29.3%	12

15. What open space interaction elements would you like to see in the Northpoint Area? (select all that apply) - comments

ResponseID Response

My emphasis on maintaining open-space natural area rather than developing a park-like area.

None

Great ideas for the community.

This is such a treasure that is Salt Lake City. The land needs to be preserved for future generations, plus people are not having children there may not be the need for more development such as empty commercial buildings. Once you destroy land for development, you cant reverse the damage.

All of the above amenities are wonderful. However, who maintains them and fronts the development costs? The land being discussed does not naturally produce any of the above items pictured. We are old salt flats that grow things with a lot of encouragement. We have been trying to improve the ground for 50 years and have done a lot of good. However, one year of not planting and working hard takes away 50 years of work. The farms out here would not be successful if all of the farmers did not have other larger farms somewhere else or other businesses that help support the farm. I support whatever developments come to this area that give the land owners the best benefits of their property. I know everyone wants what improves their community but don't forget the land owners and the work they have done for lifetimes and they need their rights reserved as well.

This ground work for homes and businesses family like the Rudy's .Drechsel's.Swaner's Hinkley's family farmed this ground but it's no longer feasible for making a living and the ground is there retirement you want to take it from them shame on you

None - not appropriate in industrial areas.

none - not appropriate in industrial areas

None. Not applicable for an industrial area.

Restrooms. Solar panels on roof. Art. Shade

none, not appropriate for industrial area

none, not appropriate for industrial area

none not appropriate on my land no water or for industrial area

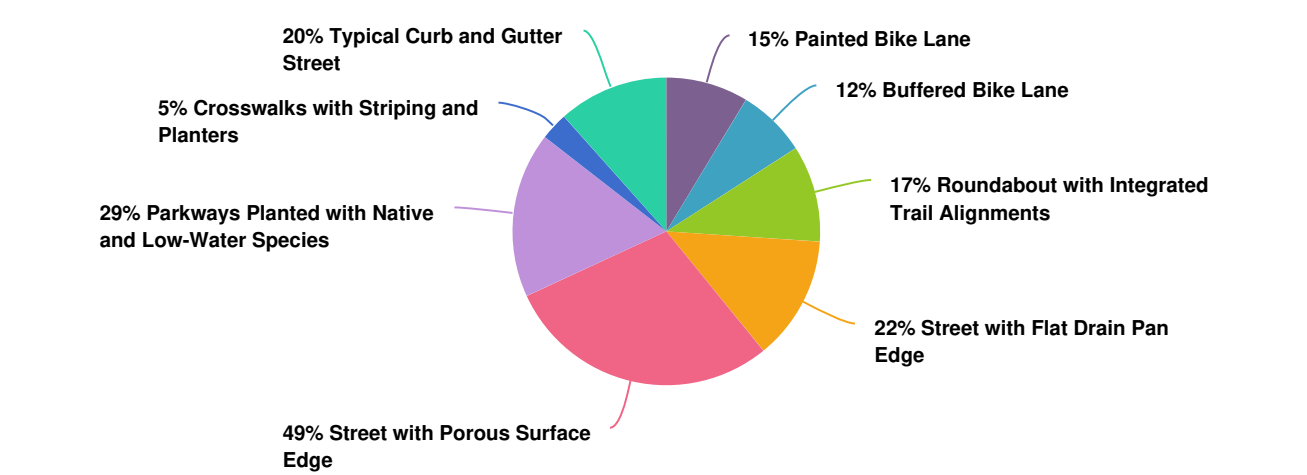
Most of these are not appropriate for an industrial area.

ResponseID	Response
------------	----------

	None, not appropriate for industrial area
--	---

	none-not appropriate for industrial area
--	--

16. When imagining the future of the Northpoint area, how do you want to see 2200 WEST improved or enhanced? Which do you think may be most appropriate to the Northpoint area? (select all that apply)



Value		Percent	Responses
Painted Bike Lane	<div><div></div></div>	14.6%	6
Buffered Bike Lane	<div><div></div></div>	12.2%	5
Roundabout with Integrated Trail Alignments	<div><div></div></div>	17.1%	7
Street with Flat Drain Pan Edge	<div><div></div></div>	22.0%	9
Street with Porous Surface Edge	<div><div></div></div>	48.8%	20
Parkways Planted with Native and Low-Water Species	<div><div></div></div>	29.3%	12
Crosswalks with Striping and Planters	<div><div></div></div>	4.9%	2
Typical Curb and Gutter Street	<div><div></div></div>	19.5%	8

17. When imagining the future of the Northpoint area, how do you want to see 2200 WEST improved or enhanced? Which do you think may be most appropriate to the Northpoint area? (select all that apply) - comments

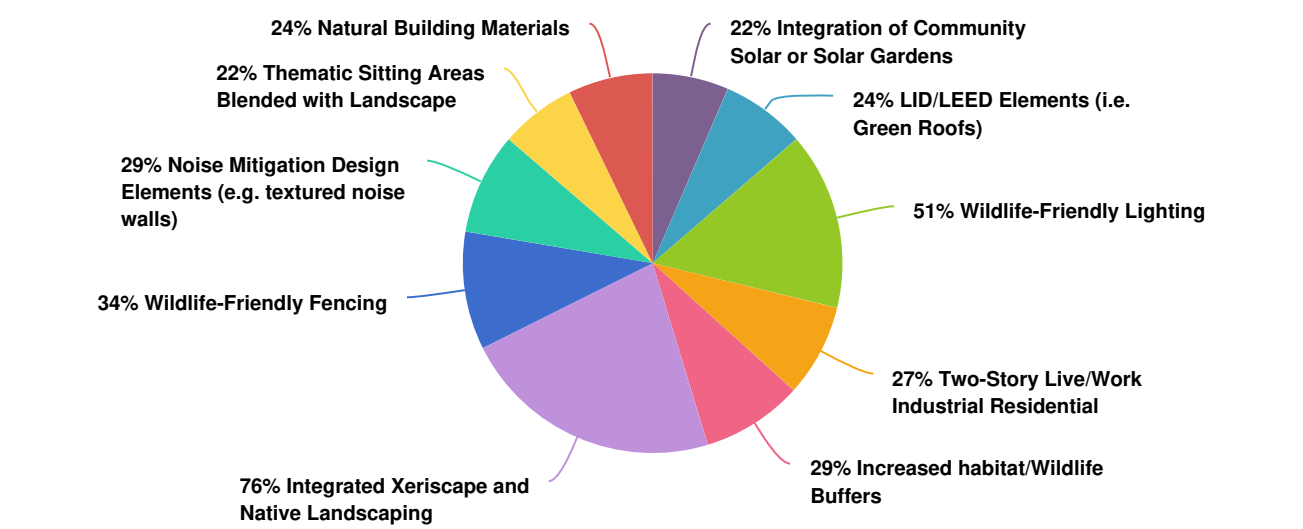
ResponseID	Response
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	Most of these options do not seem appropriate for 2200 West. What ever the design needs to implemented consistently rather than in piecemeal blocks. Such approach expensive and dangerous.
--	---

	We really don't need curb and gutter or sidewalks unless this area gets over developments by commercial buildings then we will need more for the residents.
--	---

	I do not think traditional curb and gutter are needed for the area, but some sort of drainage is needed. It is a popular biking path that needs more safety for cyclists.
--	---

18. What design elements are appropriate for new business and industrial development in the Northpoint area?



Value		Percent	Responses
Integration of Community Solar or Solar Gardens	<div><div></div></div>	22.0%	9
LID/LEED Elements (i.e. Green Roofs)	<div><div></div></div>	24.4%	10
Wildlife-Friendly Lighting	<div><div></div></div>	51.2%	21
Two-Story Live/Work Industrial Residential	<div><div></div></div>	26.8%	11
Increased habitat/Wildlife Buffers	<div><div></div></div>	29.3%	12
Integrated Xeriscape and Native Landscaping	<div><div></div></div>	75.6%	31
Wildlife-Friendly Fencing	<div><div></div></div>	34.1%	14
Noise Mitigation Design Elements (e.g. textured noise walls)	<div><div></div></div>	29.3%	12
Thematic Sitting Areas Blended with Landscape	<div><div></div></div>	22.0%	9
Natural Building Materials	<div><div></div></div>	24.4%	10

19. What design elements are appropriate for new business and industrial development in the Northpoint area? - comments

ResponseID	Response
------------	----------

	Emphyphasis on keeping natural habitat and implementing "green" approaches
--	--

	Wildlife and nature are friendly.
--	-----------------------------------

	dense and limited cars/roads
--	------------------------------

	One of the major safety issues would be for the migratory birds, because this area is wetlands that is being destroyed. You would have to put the lights and windows in consideration.
--	--

	Again, all very nice, all of the ideas that have been presented over the last several years get voted down. It seems impossible to present something that people will get on board with. I want the land owners to be able to develop their properties with the highest value and regular farming is just not a viable option economically.
--	---

	Walkable design. Sustainable design. No grass.
--	--

20. What else should the Northpoint Small Area Plan address?

ResponseID	Response
5	Place a moratorium on development until the plan is in place.
6	The construction of 2800W to pull traffic off of 2200W
7	3200 West should remain unpaved. There should be a buffer/natural area along the eastern side of 3200 West.
10	Affordable Housing. Salt Lake City is missing a big opportunity to fill the gap in affordable housing by using the acreage in this area. We are in a housing crisis, there is almost no land left to build in Salt Lake, this is a HUGE opportunity that Salt Lake could miss to build more units that are desperately needed. This is not the time for us to complain about open space. Look at the Governor's initiatives and play your part. The mayor and city council of Salt Lake are all about helping the homeless, but if we don't build more housing units the homeless population will only rise. I think the direction that it appears we are heading with this questionnaire needs to be reconsidered to include more, dense residential units for Salt Lake City and Salt Lake County
12	Need to address annexation issues and multi-jurisdictional service coordination issues NEED TO SAVE CROSS E RANCH possibly by having SL County purchase property with funding from a variety of institutional entities including USU, LDS Church, SLCity, Davis County, NSLCity, and Open Lands foundationsl Need 6 mo. moratorium on new development until Northpoint Small Area Plan is completed.
13	Plan is a waste of tax payer dollars. The market will decide the highest and best use of land in the area.
16	Ive researched what has been going on out here over the last few years, with some property owners exploring being annexed into North Salt Lake because of the regulation barriers that Salt Lake City has shown. Find compromise with the landowners or SLC may lose some of this unincorporated land and development opportunity in this area.
19	This is an industrial area and business park zoning already exists and makes sense for this project. There are already protections in place of wetlands and habitats of threatened and endangered species. 2200W is already master planned with a 90' ROW road section. Developers who develop with frontage along 2200W are already required to improve and widen the sections of 2200 W that abut their property. Many of the single family home-owners in this area are already under contract to sell their property to business park developers. There is no reason to plan this area with the preservation of existing single family homes as a goal.

ResponseID Response

22	The valley and particularly the westside is already saturated with air quality issues. Any commercial development should exclude air pollution inputs. Additionally, water supply and quality are major issues for the state and communities which calls for restrictions on water use and waste.
24	Update the community.
26	density and walkability is best for wildlife
28	Wetlands and the fact that they are endangered. There is becoming less space for wildlife. USDA has programs for Urban Agriculture.
31	Please don't forget about the residents! This survey was focused on business development and none of the questions focused on also preserving the residential zoning in the area. We are already being bullied by developers to sell our land so they can rezone for business. PLEASE DO NOT ALLOW REZONING FOR BUSINESSES IN THE VERY SMALL REMAINING RESIDENTIAL ZONED AREAS. There are plenty of open spaces for developers to build that don't require forcing us out of our homes.
33	Setbacks and landscape areas along major roads.
34	Three points: 1. Leave 3200 West unimproved. 2. Restrictions on zoning changes until master plan is complete 3. Set aside buffer/open space lands clustered east of 3200 West.
37	The small area plan needs to think about both sides. There are a lot of neighbors talking about conservation of their lifestyle but I'm pretty sure none of them is making their living from farming. I love this area more than the average person but, I also know the realities of farming and maintaining a farm and or open space. The county could maintain or develop some trails and require certain landscaping. I know that those kinds of requirements exist in all developments. I prefer they allow the land owners the right to sell/develop their properties. There are many options for good development in this area. Residents (37ish houses) along 2200 west have been against a business park development, industrial, and residential. They want it to remain the same as always. However, that cannot happen nor should it.
39	The homeowner and people that own businesses out there
48	Zoning of specific areas to BP or M1
52	Designate this land as light industrial in the future land use map.
54	Designate this land as light industrial in the future land use map.

ResponseID Response

58 This area should be light manufacturing/industrial. With the 435 acres of BP, this whole area should follow suit. More tax basis for city, great area for business, less water usage than farmers, etc.

59 Water use.

60 Designate this land as light industrial in the future land use map

61 Designate this land as light industrial in the future land use map

63 Designate this land as light industrial in the future land use map

64 Designate this land as Business Park and/or Light Industrial

67 With the business park areas that have been approved, it makes the most sense for SLC to default to Business Park zoning for this North Point area.

70 Designate this land as light industrial in the future land use map

71 Designate this land as light

75 Do we have the water to build more? How will building in this area further impact the Great Salt Lake? Very concerned about maintaining open space and not further taxing our diminishing water systems.

21. Would you like to stay involved with this planning process? Please leave your email below!



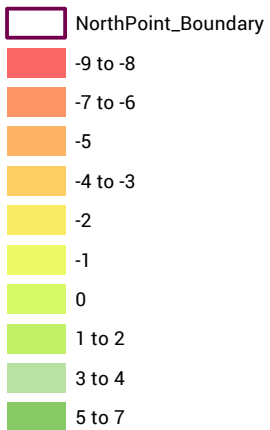


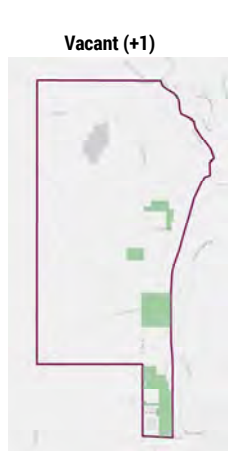
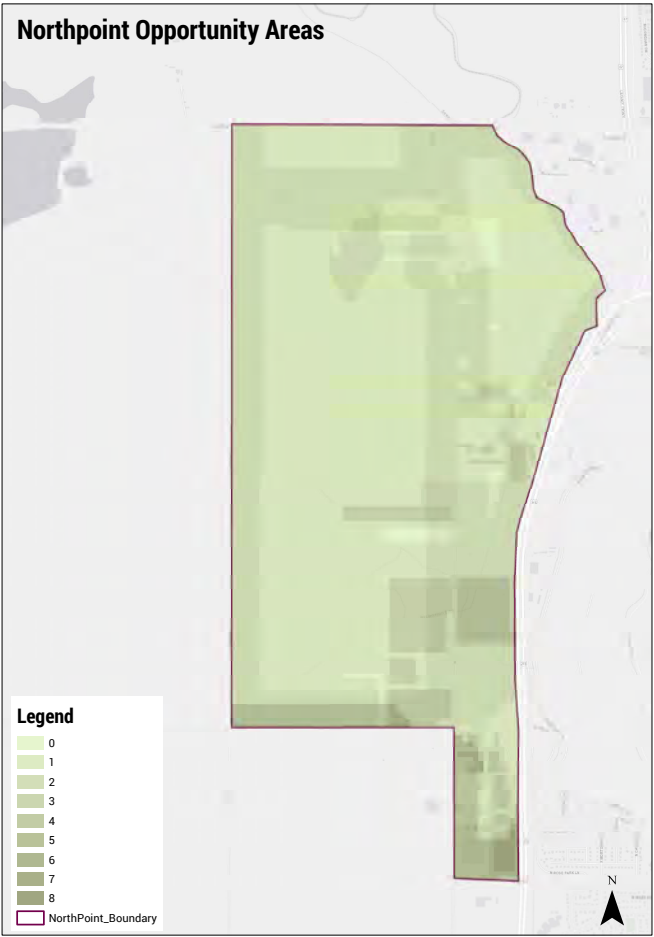
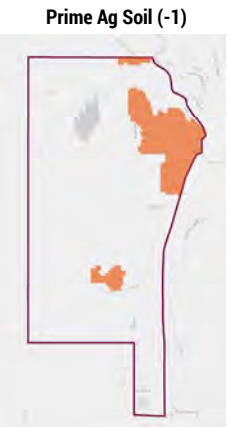
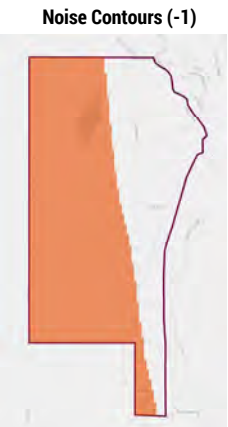
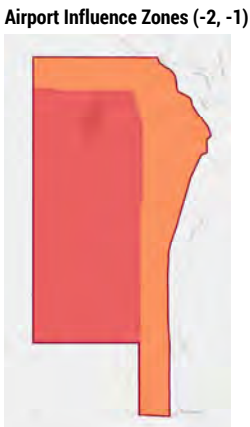
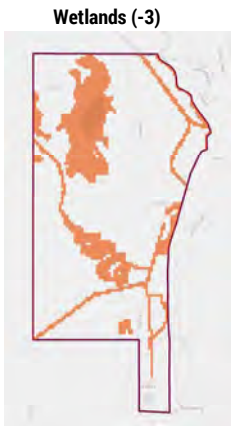
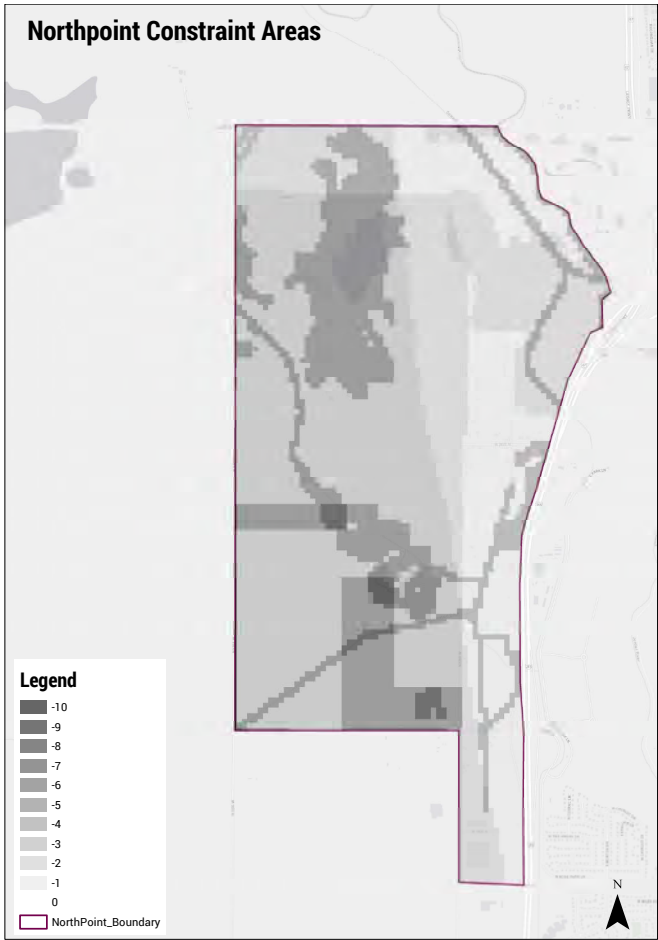
APPENDIX C

CONSTRAINTS

Northpoint Opportunity Areas

Legend









APPENDIX D

FINANCIAL ANALYSIS

ECONOMIC DEVELOPMENT AND FUNDING OPTIONS

Northpoint represents an opportunity for Salt Lake City to encourage economic development that is compatible with the unique natural and built environment of the area, including proximity to the Salt Lake City International Airport. This area is best suited for business park and industrial development yet is hampered by the lack of significant infrastructure including transportation options and high-quality fiber broadband to the area. To realize its potential, the area requires substantial infrastructure improvements. Funding options for these improvements are discussed in this section of the report.

It is a challenging time to fund infrastructure as construction costs are rising rapidly, along with interest rates. Infrastructure is generally needed before development can occur, which means that revenues generated by the project are not available for funding at the time they are most needed. Rather, other funding means must be identified, with revenue streams generated from development used later as a payback mechanism.

Economic development is a key component of generating new revenue streams and is addressed in this report, along with the potential funding mechanisms that such development could enable.

MARKET ANALYSIS

Northpoint is suitable for industrial and agricultural use, with limited residential. The area is proximate to the Salt Lake City International Airport and, as such, experiences high noise levels that make residential development difficult.

The industrial market is strong in Salt Lake County, with a vacancy rate of only 2.2 percent and rising lease rates which have increased from an average (NNN) rate of \$0.53 in 4th quarter 2020 to \$0.63 in 4th quarter 2021. Total Salt Lake County inventory approximates 135 million square feet, with 9 million square feet of space under construction. In the northwest quadrant of Salt Lake County, the vacancy rate is 2.65 percent, with year-to-date (YTD) absorption of 7.5 million square feet and an average asking rate of \$0.60 (NNN).¹

Based on vacant acreage in the Northpoint area that the Salt Lake County Assessor's Office currently classifies as industrial, the area could absorb an additional 650,000 to 1,000,000 square feet of industrial space. This appears reasonable given current absorption patterns and the shortage of industrial space in the market. The biggest obstacles to industrial development appear to be supply chain shortages, rising construction costs and rapidly escalating interest rates.

¹ Source: Colliers, Salt Lake County Industrial Market Report 4Q 2021.

COMBINED COMPONENTS FOR FUNDING OPTIONS

The available tools and issuing entities discussed in this report may be combined in a variety of viable options to arrive at the desired funding level for the Northpoint area. Possible funding mechanisms include the following, each of which is discussed in more detail in following sections.

- Tax Increment Areas
 - Community Reinvestment Areas (CRAs)
 - Transportation Reinvestment Zones (TRZs)
 - Tax Increment Bonds
- Public Infrastructure Districts (PIDs)
- Special Assessment Areas (SAAs)
- Impact Fees
- Municipal Energy Tax

TAX INCREMENT AREAS

Through the creation of a tax increment area, tax revenues generated within the designated project area are split into two components:

- (i) Base Revenues – The amount available before the tax increment area is established. Base revenues are shared among a mix of local governments that have the power to assess taxes such as schools, cities, counties, and special districts; and
- (ii) Incremental Revenues – These are tax revenues in excess of the base revenues that are generated by new growth in the project area. If a project area is created, the incremental tax revenues can flow to the project area for a period of time to encourage economic development.

Some states, including Utah, allow incremental local sales tax revenues, as well as property taxes, to flow to a project area for a period of time. By giving exclusive use of incremental revenues to the project area, the creation of a successful tax increment area generates a new revenue stream that can be used to pay for projects, provide incentives to developers, or collateralize tax increment bonds.

The most common uses of tax increment have been for infrastructure such as roads, utilities, telecommunications, electrical upgrades and burying power lines, and parking structures. Tax increment has also been used for demolition, tenant improvements, land acquisitions, environmental cleanup, trails, lighting, signage, playgrounds, incentives to developers, economic development activities and housing.

Utah currently allows for the enactment of three types of tax increment areas:

- Community Reinvestment Areas (CRAs)
- Transportation Reinvestment Zones (TRZs)
- Housing & Transit Reinvestment Zones (HTRZs)

Of these three types of tax increment areas, CRAs and TRZs could be used as financing tools for the Northpoint area. HTRZs rely on density of housing and this type of development is not suitable for Northpoint.

COMMUNITY REINVESTMENT AREAS (CRAS)

In Utah, tax increment areas have been known by a wide variety of names over time – RDAs, URAs, EDAs, CDAs, and now as CRAs or Community Reinvestment Areas. As of 2016, the Legislature combined all types of project areas—urban renewal, economic development, and community development into a new single “Community Reinvestment Project Area” (CRA). Existing project areas will be allowed to continue, but all new project areas will be known as CRAs.

The CRA Budget may either be approved by a Taxing Entity Committee (TEC) or through Interlocal Agreement with taxing entities, except where the Agency chooses to conduct a blight study to determine the existence of blight and to utilize limited eminent domain powers, which requires the approval of the TEC of both blight and the budget.

If there is a finding of blight, 20 percent of the tax increment must be set aside for affordable housing. For all other projects, 10 percent of the tax increment is required to be set aside for affordable housing, if the annual increment is over \$100,000. However, housing funds may be spent for affordable housing statewide and are not limited to being spent within a project area. Noticing and hearing requirements apply with the CRA designation.

After the tax increment collection period has expired, the tax increment dollars that previously flowed to the CRA will flow to the taxing entities that levy the property taxes within the project area. In most cases, taxing entities receive more property tax revenues annually following expiration of the tax increment collection period than before, as property values are likely to have increased significantly through the redevelopment process.

TABLE 1: COMMUNITY REINVESTMENT AREAS – ADVANTAGES AND DISADVANTAGES

Advantages	Disadvantages
Community Reinvestment Areas	Community Reinvestment Areas
Creates a new revenue stream.	Requires cooperation of other taxing entities.
Relatively easy to create.	10% of revenues must be directed to affordable housing.
Flexible uses of funds.	Revenues may take years to build up as development occurs over time.

The Northpoint area contains roughly 1,323 acres and five tax districts. All of the tax districts are within Salt Lake City, with the exception of Tax District ACT that is found within unincorporated Salt Lake County.

TABLE 2: NORTH POINT EXISTING MARKET VALUES AND ACREAGE

Property Values	# of Parcels	Total Market Value	Residential Market Value	Acres
Tax District 13	63	\$74,752,600	\$30,700,900	666.83
Tax District 13 Q	3	\$7,927,300		17.37
Tax District 13 I	3	\$51,954,200		27.26
Tax District 13 R	14	\$21,076,200	\$1,529,600	27.01
Tax District ACT	47	\$27,957,700	\$12,251,900	584.37
TOTAL	130	\$183,668,000	\$44,482,400	1,322.84

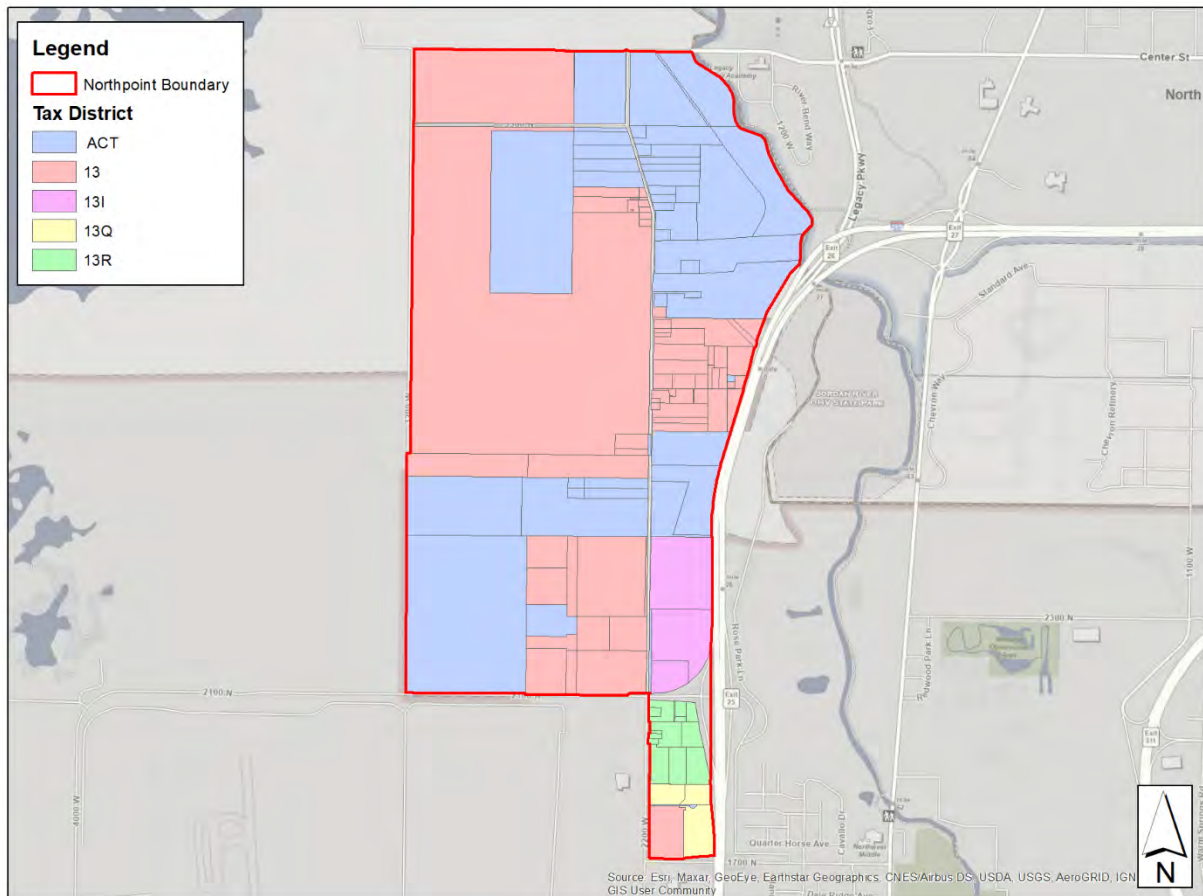


Figure 1: Northpoint Tax Districts

Although there are five separate tax districts, districts 13 and 13Q include the same taxing entities; districts 13I and 13R also have the same taxing entities. The taxing entities and their tax rates are as follows:

TABLE 3: TAX DISTRICTS AND TAXING ENTITIES

	Tax Rate
Tax District 13 and 13Q	

	Tax Rate
Salt Lake County	0.001777
Multi-County Assessing & Collecting Levy	0.000012
County Assessing & Collecting Levy	0.000196
Salt Lake City School District	0.004809
Salt Lake City	0.003424
Salt Lake City Library	0.000652
Metropolitan Water District Salt Lake	0.000253
Salt Lake City Mosquito Abatement	0.000115
Central Utah Water Conservancy District	0.0004
TOTAL	0.011638
Tax District 13I and 13R	
Salt Lake County	0.001777
Multi-County Assessing & Collecting Levy	0.000012
County Assessing & Collecting Levy	0.000196
Granite School District	0.007105
Salt Lake City	0.003424
Salt Lake City Library	0.000652
Metropolitan Water District Salt Lake	0.000253
Salt Lake City Mosquito Abatement	0.000115
Central Utah Water Conservancy District	0.0004
TOTAL	0.013934
Tax District - Unincorporated	
Salt Lake County	0.001777
Multi-County Assessing & Collecting Levy	0.000012
County Assessing & Collecting Levy	0.000196
Granite School District	0.007105
Central Utah Water Conservancy District	0.0004
Salt Lake County Municipal-Type Services	0.000051
Unified Fire Service Area	0.001594
Salt Lake Valley Law Enforcement Service Area	0.001973
Salt Lake County Library	0.000474
TOTAL	0.013582

The market value of the property is much higher than the taxable value in the area for several reasons. First, primary residential development is taxed at 55 percent of market value. Agricultural property is in greenbelt status and taxed at extremely low rates, and public properties are tax exempt. Therefore, while the market value is nearly \$184 million, taxable value is estimated at roughly \$67.9 million.

TABLE 4: ESTIMATED NORTHPOINT TAXABLE VALUE

	Estimated Taxable Value
Tax Districts 13 and 13Q	\$37,500,000
Tax Districts 13 I and 13 R	\$20,400,000
Tax District ACT	\$10,000,000
Total Taxable Value	\$67,900,000

Taxable value will increase as development occurs in Northpoint. Of the 1,323 acres in Northpoint, approximately 437 acres are either vacant or held in agricultural use.

TABLE 5: VACANT ACRES

Vacant Acres	Tax Districts 13 and 13Q	Tax Districts 13I and 13R	Tax District ACT	Total
Residential	8.34		19.81	28.15
Industrial	17.40	14.19	42.56	74.15
Agricultural	111.68		223.04	334.72
TOTAL Acres	137.42	14.19	285.41	437.01

For purposes of estimating future tax revenues, this study assumes that the residential and industrial vacant acres are developed as residential and industrial respectively and makes no assumptions about future development of the agricultural property.

TABLE 6: PROJECTIONS OF FUTURE DEVELOPMENT

	Amount
Residential Development	
Undeveloped acres	28.15
Units per Acre	2
Units developed	56
Average market value per unit	\$600,000
Average taxable value per unit	\$330,000
Total residential taxable value	\$18,480,000
Industrial Development	
Undeveloped acres	74.15
Floor area ratio	0.2*
Taxable value per sf	\$200
Estimated taxable value	\$129,193,733
*If the floor area ratio (FAR) can be increased to 0.3, then the estimated total taxable value would increase to nearly \$194 million	

For purposes of analysis, this report assumes that the majority of the development takes place in the unincorporated County, as it has the largest amount of vacant acres. The table below shows projections of roughly \$2 million per year in additional property tax revenues from this area.

TABLE 7: PROJECTIONS OF FUTURE DEVELOPMENT

	Tax Rates - ACT	Incremental Revenues Generated
Salt Lake County	0.001777	\$262,416
Multi-County Assessing & Collecting Levy	0.000012	\$1,772
County Assessing & Collecting Levy	0.000196	\$28,944
Granite School District	0.007105	\$1,049,222
Central Utah Water Conservancy District	0.0004	\$59,069
Salt Lake County Municipal-Type Services	0.000051	\$7,531
Unified Fire Service Area	0.001594	\$235,392
Salt Lake Valley Law Enforcement Service Area	0.001973	\$291,360
Salt Lake County Library	0.000474	\$69,997
TOTAL	0.013582	\$2,005,705*
*If the industrial development assumptions are increased to a FAR of 0.3, rather than 0.2, then annual incremental property tax revenues generated increase to nearly \$2.9 million annually.		

A portion of these revenues could be allocated to a CRA for a period of time in order to pay for needed improvements and infrastructure in the area.

TRANSPORTATION REINVESTMENT ZONE (TRZ)

A TRZ is one type of area that can be formed where tax increment can be used to accelerate development within the defined project area. According to Utah Code §11-13-103(22), “Transportation Reinvestment Zone” means an area created by two or more public agencies by interlocal agreement to capture increased property or sales tax revenue generated by a transportation infrastructure project. TRZs are ideal for projects such as Frontrunner, light rail, or major arterials that span multiple jurisdictions.

Any two or more public agencies may enter into an agreement to create a transportation reinvestment zone but one of these entities must have land use authority over the TRZ area – in other words, Salt Lake City must be a partner in this endeavor.



A TRZ is much like a Community Reinvestment Area (CRA) in that a portion of tax increment is pledged to the project for a specified period of time. The agreement between the two or more public entities must include the following, as specified in Utah Code §11-13-227(2):

- Define the transportation need and proposed improvement
- Define the boundaries of the zone
- Establish terms for sharing sales tax revenue among the members of the agreement, if sales tax is to be included
- Establish a base year to calculate the increase of property tax revenue within the zone
- Establish terms for sharing any increase in property tax revenue within the zone
- Hold a public hearing regarding the details of the TRZ

Property tax revenues that are shared between members of the agreement are required to be incremental (Utah Code §11-13-227(2)(e)). In order to identify incremental revenues, a “base year” needs to be established. The law clearly allows for the sharing of both sales tax and property tax revenue among the members of the agreement.

There are advantages to governance with TRZs, as compared to CRAs, for projects that span multiple jurisdictions. In fact, there are only a few redevelopment areas in Utah that currently overlap multiple communities. While such are allowed by law, governance can be tricky. For example, in a CRA spanning two cities, each city would have its own redevelopment agency. Who then governs the project area? Joint RDA board meetings can be held, each agency board can meet separately, or there can be a MOU designating one of the RDA boards as the lead agency. Experience dictates that concerns often arise when more tax increment is generated in one jurisdiction of the project area than in another. There are often concerns about equity in spending funds in the same jurisdiction from which they come. Each redevelopment agency involved has to submit its annual report detailing the increment generated and how funds were spent, further exacerbating this concern.

The TRZ overcomes many of these problems. First, with a TRZ, there is no requirement for RDA involvement, and therefore no need for RDA meetings. The TRZ is simply governed by an interlocal agreement signed by the parties. TRZs have proven effective in other states when projects cross multiple jurisdictions. With a TRZ there is no requirement to measure in which community increment is generated and where funds are spent. The purpose is simply to achieve an overall project. And only one annual report has to be filed for the TRZ – not separate reports for each participating entity.

Another advantage to TRZs is the ability to obtain the commitment of transportation agencies, such as UDOT or UTA, for specific projects. Interlocal agreements between the public entity with the land-use authority and a transportation agency will identify the specific projects associated with the TRZ. This will add another level of certainty to local planning efforts and will give these public entities some additional leverage in prioritizing needed transportation projects.

Advantages and Disadvantages

The following table lists the advantages and disadvantages of funding transportation projects with tax increment generated in Transportation Reinvestment Zones:

TABLE 8: TRANSPORTATION REINVESTMENT ZONES AS A FUNDING SOURCE FOR TRANSPORTATION PROJECTS.

Advantages Transportation Reinvestment Zones	Disadvantages Transportation Reinvestment Zones
Creates a new revenue stream.	Revenue directed to transportation projects will not be available to provide other services.
Relatively easy to create.	Requires cooperation between at least two entities.
Projected to produce substantial revenue stream over time.	Must find a nexus with transportation projects to justify use of the increment.
No affordable housing requirement.	Revenues may take years to build up as development occurs over time.

TAX INCREMENT BONDS

Tax increment Bonds were developed in California in 1952 as an innovative way of raising local matching funds for federal grants. They became increasingly popular in the 1980s and 1990s, when there were declines in subsidies for local economic development from federal grants, state grants, and federal tax subsidies (especially industrial development bonds).

Tax Increment Bonds are collateralized by the incremental growth in property taxes within a given project area. They capture the future tax benefits of real estate improvements to pay the present cost of those improvements. It is a financing strategy designed to make improvements to a targeted project area or district without drawing on general fund revenue or creating a new tax.

Ratings on tax increment bonds are tied to the performance of the area or district, not to the creating government's general fund. As a result, the ratings differ from those of the creating entity's general obligation rating. The rating of tax increment bonds hinges on local economics, trends, and taxpayer diversity, with taxpayer diversity being the most highly correlated statistic.

Rating agencies evaluate whether the tax increment revenues could survive the loss of one or more top taxpaying property owners, how debt service could be managed in the case of broad-based decline of assessed value, real estate trends and historical assessed values in the designated area, and the types of properties located or being developed in the tax increment area. The assessed value of hotels is the most volatile, followed by warehouses, commercial, condos, and last residential.

Many issuers opt to offer tax increment bonds on a non-rated basis. It is virtually impossible to secure a rating for or sell a tax increment bond before the increment is actually flowing, unless there is recourse to the local government's credit or some other enhancement.

Typically, tax increment bonds carry longer terms (anywhere from 10 to 30 years) and are purchased at a fixed rate using larger denominations of \$100,000. There is usually no recourse to either the issuer or the developers who may benefit from the bonds. Pledged revenues vary, but a typical pledge is a senior security interest in the tax increment revenues as well as any debt service reserve funds. The bonds are often offered via a limited public offering and most often sold to institutional buyers (primarily mutual funds and occasionally property/casualty insurers) using a limited offering memorandum.

It is typical to see interest capitalized for at least two to three years to allow increment to begin flowing before debt service payments are required from that increment. Unspent proceeds, capitalized interest and reserve funds are held by a Trustee. Debt service coverage covenants vary based on type of tax increment revenue and other security features associated with the bonds, but minimum coverage requirements are almost always at least 1.25 times annual debt service.

Advantages and Disadvantages

The following table lists the advantages and disadvantages of funding with tax increment bonds:

TABLE 9: TAX INCREMENT BONDS AS A FUNDING SOURCE

Advantages Tax Increment Bonds	Disadvantages Tax Increment Bonds
Create a new revenue stream that can fund capital improvements and economic development.	Tend to carry higher interest and costs of issuance.
Creating entity does not have to bear financial burden alone but can share it with other taxing entities within a project area.	Often require the cooperation and agreement of multiple taxing entities to generate sufficient incremental revenues to finance the desired infrastructure.
Tax increment revenues can be used to pay for administrative expenses.	Bonds can't be sold unless the tax increment is already flowing or is imminent and nearly certain to flow or is enhanced by a government's credit or other mechanism.
Financial and legal liability is limited by having a redevelopment agency. ²	Typically take longer from start to finish than other financing types. ³
Creating entity may gift tax revenues or property to provide incentives for development.	Critics of Tax Increment Bonds sometimes assert that tax increment is just a reallocation of tax revenues by which some municipalities win, and others lose. ⁴

² An RDA is a separate political subdivision which can enter into agreements with developers and issue the bonds.

³ It is difficult to estimate the time required for the "political" side of the process, which often requires significant information sharing between local government and developers, including a public hearing for approval of the Project Area Plan and Budget. Setting aside the political requirements, the bond issuance process usually takes three to five months.

⁴ Critics of Tax Increment Bonds sometimes assert that some or all the increment is not attributable to the creation of the tax increment area and that the new property value growth would have occurred anyway.

Advantages Tax Increment Bonds	Disadvantages Tax Increment Bonds
Creating entity may be able to encourage or accelerate the timeframe of desired development types through offering tax increment incentives to the developer.	
Mortgage on the property can also be given as bond security under Utah law in addition to incremental revenue.	

PUBLIC INFRASTRUCTURE DISTRICTS (PIDs)

PIDs are generally most successful in larger, undeveloped areas where there are significant infrastructure needs. Because the unanimous consent of all property owners is required for the creation of a PID, it is difficult to establish PIDs in areas with numerous property owners. However, portions of the study area could be included – especially those areas with larger parcels, fewer property owners, and significant infrastructure needs.

If created, a PID can be combined with other revenue sources such as tax increment and those revenues could be used to pay the PID bonds. These funding tools may further facilitate development and increase property values, which may in turn provide for more opportunities to fund basic infrastructure (through tax increment financing or general tax collection). The PID tool allows for creation of a separate taxing entity in order to fund public infrastructure. Ultimate users of the property pay for the improvements via the taxing entity through property assessments. These assessments permit for bonding, allowing for covering upfront infrastructure expenses that are repaid over periods typically near 30 years. This tool results in higher property taxes for property owners/users in the defined district.

Consequently, benefits beyond the improved infrastructure can be included in the area. This can be in the form of better landscaping, street lighting, public spaces, parks, trails, finishes, etc. These benefits aid in creating property appeal, property value increases and in attracting top quality businesses.

The PID tool also represents a valuable option for cities who are reticent to bond with property tax revenues in a standard tax increment collection area. Bonding permits for upfront infrastructure costs to be covered, oftentimes expediting development that may not have otherwise occurred. A city may create a PID with no increase in the tax rate and use the PID as a conduit to issue bonds. In this approach, the city is not financially responsible for the bond payments, and the bonding does not affect the city's credit rating.

The process for starting a Public Infrastructure District begins with a citywide policy. This represents a "30,000-foot" view of the tool for the municipality and merely outlines the guidelines as to how a developer should submit for a PID. The PID policy may incorporate specific goals and vision statements of the city. Once a policy is adopted, a developer may submit a letter of intent to create a PID. This is reviewed by the city, and if approved, governing documents are required to be submitted and approved

by the City Council. The simple passing of a general PID policy does not require the City Council to approve governing documents or letters of intent.

Consequently, the PID policy represents another tool that can be used when appropriate. As of 2022, several cities throughout Utah have adopted PID policies and multiple public infrastructure districts have been formed.

TABLE 10: PUBLIC INFRASTRUCTURE DISTRICTS AS A FUNDING SOURCE

Advantages PIDs	Disadvantages PIDs
Create a new revenue stream that can fund capital improvements and economic development.	Tend to carry higher interest and costs of issuance.
Any debt issued is not on the books of the local government entity.	Cities may feel it limits public support for future tax rate increases or bond elections due to the perception of already-high rates.
Can raise a significant amount of revenue with legally-allowed tax rates of up to 15 mils.	Requires unanimous support of all taxing entities to put in place.
Accelerates development timeframe through upfront funding for capital costs.	Ongoing PID governance
Can reduce the need for impact fees.	Competitiveness of site with other sites given higher tax rates
Mortgage on the property can also be given as bond security under Utah law in addition to incremental revenue.	
Cost is much lower than other development financing.	

The current taxable value of North Point is approximately \$68,000,000. The maximum mill rate allowed by Utah law is 0.015; however, districts are choosing to enact much lower rates. Politically, it would be nearly impossible to obtain the consent of the entire Northpoint area to create a PID. However, smaller sections that are wanting to encourage economic development could be developed as PIDs. The table below shows the amount of annual property tax revenues that could be generated for such a district given varying taxable values and varying tax rates up to the maximum of 0.015.

TABLE 11: PUBLIC INFRASTRUCTURE DISTRICT ANNUAL REVENUES BASED ON VARYING MILL RATES AND TAXABLE VALUES

Property Taxable Values	0.015 Mill Rate	.0075 Mill Rate	.004 Mill Rate
\$10,000,000	\$150,000	\$75,000	\$40,000
\$20,000,000	\$300,000	\$150,000	\$80,000
\$30,000,000	\$450,000	\$225,000	\$120,000

SPECIAL ASSESSMENT AREAS (SAAs)

Special Assessment Areas (“SAAs”), formerly known as Special Improvement Districts or “SID”s, are a financing mechanism that allows governmental entities to designate a specific area for the purpose of

financing the costs of improvements, operation and maintenance, or economic promotion activities that benefit property within a specified area. Entities can then levy a special assessment, on parity with a tax lien, to pay for those improvements or ongoing maintenance. The special assessment can be pledged to retire bonds, known as Special Assessment Bonds, if issued to finance construction of a project. Utah Code §11-42 deals with the requirements of special assessment areas.

The underlying rationale of an SAA is that only those property owners who benefit from the public improvements and ongoing maintenance of the properties will be assessed for the associated costs as opposed to other financing structures in which all City residents pay either through property taxes or increased service fees. While more information about SAAs is included below, it could be difficult politically for the City to obtain support from a large number of property owners.

While not subject to a bond election as is required for the issuance of General Obligation bonds, SAAs may not be created if 40 percent or more of those liable for the assessment payment⁵ protest its creation. Despite this legal threshold, most local government governing bodies tend to find it difficult to create an SAA if even 10-20 percent of property owners oppose the SAA.

Once created, an SAA's ability to levy an assessment has similar collection priority / legal standing as a property tax assessment. However, since it is not a property tax, any financing secured by that levy would likely be done at higher interest rates than general obligation, sales tax revenue or utility revenue bonds. Interest rates will depend on a number of factors including the ratio of the market value to the assessment bond amount, the diversity of property ownership and the perceived willingness and ability of property owners to make the assessment payments as they come due. Even with the best of special assessment credit structure, if bonds are issued they are likely to be non-rated and therefore would be issued at rates quite a bit higher than similar General Obligation Bonds that would likely be rated. All improvements financed via an SAA must be owned by the City and the repayment period cannot exceed twenty (20) years.

Whenever SAAs are created, entities have to select a method of assessment (i.e. per lot, per unit (ERU), per acre, taxable value, market value, by linear foot frontage, etc.) which is reasonable, fair and equitable to all property owners within the SAA. State law does not allow property owned by local government entities such as cities or school districts to be assessed.

TABLE 12: SPECIAL ASSESSMENT AREAS AS A FUNDING SOURCE

Advantages SAAs	Disadvantages SAAs
Bonds are tax-exempt although the interest cost is not as low as a GO or revenue bond	Forty percent of the assessed liability, be it one property owner or many could defeat the effort to create the SAA if they do not want to pay the assessment
No requirement to hold a bond election but the City must hold a meeting for property owners to be assessed before the SAA can be created	Some increased administrative burden for the City although State law permits an additional amount to be included in each assessment to either pay the City's increased administrative costs or permit the City to hire an outside SAA administrator

⁵ Based on the method of assessment selected, i.e., acreage, front footage, per lot, etc.

Advantages SAAs	Disadvantages SAAs
Only benefited property owners pay for the improvements or ongoing maintenance	The City cannot assess government-owned property within the SAA
Limited risk to the City as there is no general tax or revenue pledge	
Flexibility since property owners may pre-pay their assessment prior to bond issuance or annually thereafter as the bond documents dictate – if bonds are issued	

IMPACT FEES

Impact fees are one-time fees paid by new development to offset the capital costs associated with new development for basic utilities such as water, sewer, storm water, public safety, roads and parks/trails. In order to collect impact fees, cities must carefully follow the requirements of Utah Code 11-36a which includes the following major steps.

- Prepare and pass a resolution authorizing study of an impact fee
- Conduct an impact fee study to determine the appropriate amount of such a fee
- Provide public notice of the possible fee 14 days prior to the public hearing
- Hold a public hearing to take comment regarding the proposed fee

Salt Lake City has already established impact fees that could be used to generate revenues on projects developed within its City boundaries. However, Salt Lake County would need to charge impact fees on the unincorporated areas of North Point. Impact fees collected would need to be spent on capital projects listed in each respective entity's Impact Fee Facilities Plans (IFFPs). Therefore, careful coordination would need to take place between Salt Lake City and the County to ensure that the costs of needed projects are fairly allocated between the two entities.

Advantages and Disadvantages

The following table lists the advantages and disadvantages of funding projects with impact fees:

TABLE 13: IMPACT FEES AS A FUNDING SOURCE

Advantages Impact Fees	Disadvantages Impact Fees
New development pays for its fair share of the costs incurred by new development	Adds additional costs to development
	Impact fees are generally paid when building permits are issued; therefore, funds are often not available upfront when infrastructure needs are greatest

Advantages	Disadvantages
Impact Fees	Impact Fees
	Impact fees cannot be used to cure existing deficiencies

MUNICIPAL ENERGY TAX

Salt Lake City has enacted the municipal energy tax to the full 6 percent allowed by law on all taxable portions of electric and gas bills. Therefore, any development that takes place in Salt Lake City would generate this additional revenue that could be used to assist with economic development and infrastructure costs in Northpoint. The municipal energy tax applies only to development that occurs in Salt Lake City and not in Salt Lake County.

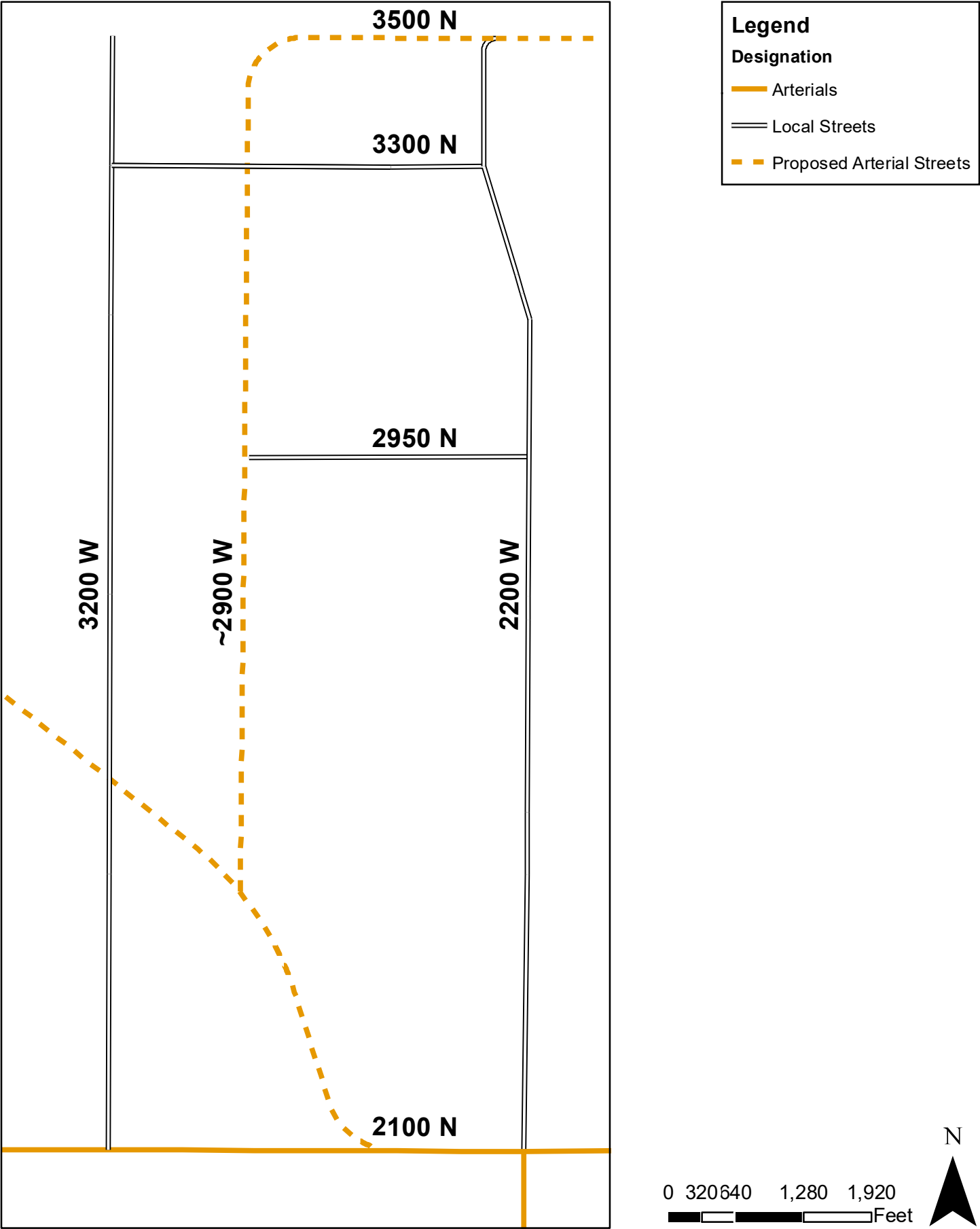




APPENDIX E

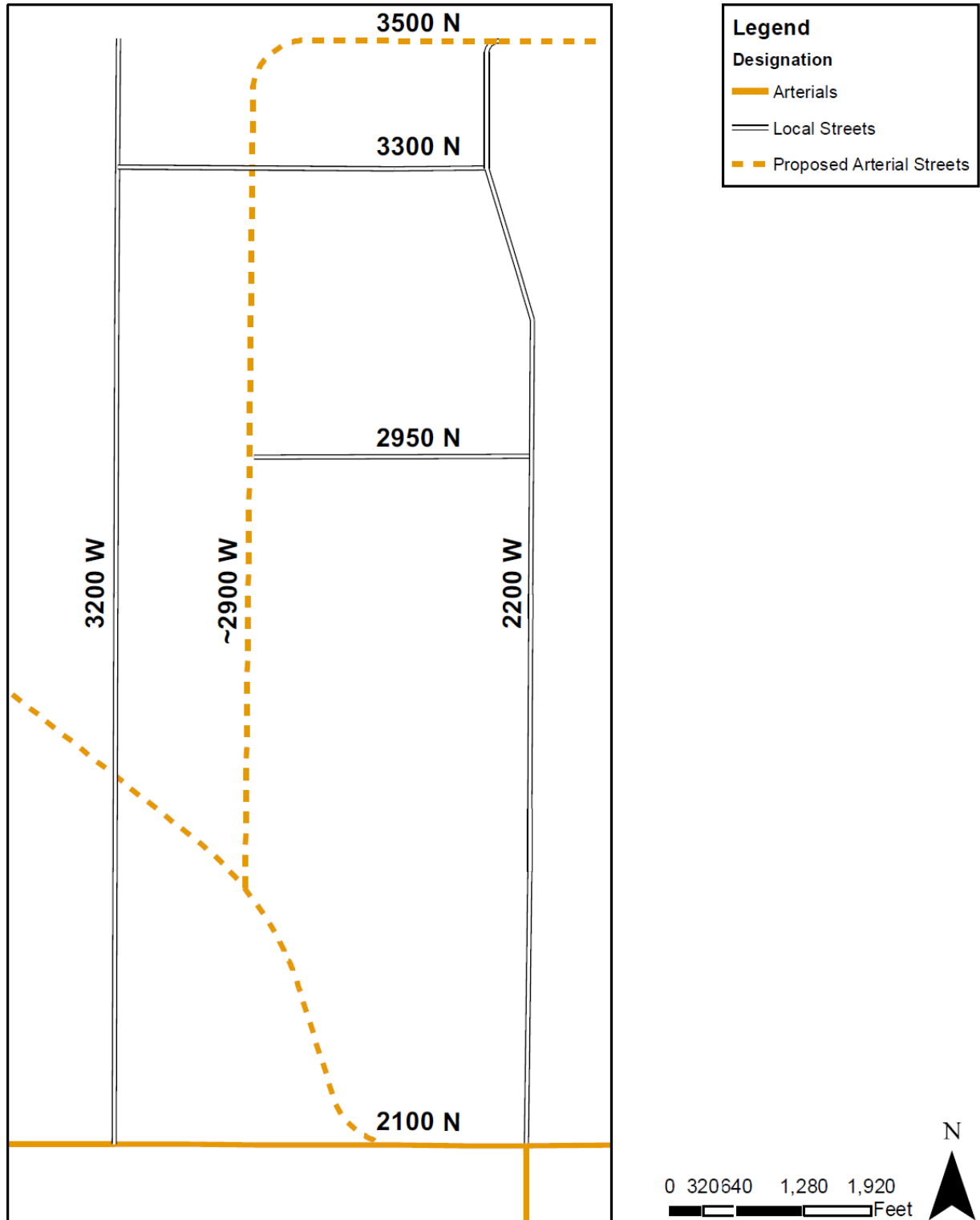
MAJOR STREETS PLAN AMENDMENT

Salt Lake City Major Street Plan Amendment for Northpoint Area



ATTACHMENT B: Major Street Plan Amended Map

Salt Lake City Major Street Plan Amendment for Northpoint Area



ATTACHMENT C: Public Comments

Received Since October 26, 2022 Public Hearing

Public Notice, Meetings, Comments

The following public comments were received following the Planning Commission meeting held on October 26, 2022. For comments received before that meeting, please see the prior [staff report](#). This staff report attempts to summarize major themes of comments received in writing and at the Westpointe Community Council meeting held on November 9, 2022. Key themes are noted below for ease of reference, but please see the associated documents for full details.

- Concern that the area should not transition to light industrial development and should remain agricultural and rural residential. This was a key discussion point during the Westpointe Community Council meeting.
- Comments received in support of transitioning to light industrial.
- Wetland buffers are overly restrictive and do not provide enough detail on how they will be implemented in future zoning.
- Proposed wetland buffer width is not adequate and should not be reduced.
- Maximum building length along 2200 West is too restrictive.
- Land adjacent to the Jordan River should remain as open space.
- Land adjacent to the Jordan River should have a 300' buffer rather than the recommended 100'.
- Land adjacent to 3200 West should be protected as open space.
- Concern with the update to the plan that states that distribution-focused uses should be limited.

Any comments received after the publishing of this report will be sent directly to the Planning Commission for their review and consideration.

From: Westpointe 2
Sent: Thursday, December 1, 2022 3:53 AM
To: Gilmore, Kristina
Cc: Norris, Nick; Petro-Eschler, Victoria; Anthony Thomasson; 'Luke Garrott'; 'Allison Musser'; Annette Richards; 'Jessica Esparza'; 'Lynn Skidmore'; 'Sharon Pohlman'; 'Terry Marasco'; 'Todd Hadden'; 'westpointe admin'
Subject: (EXTERNAL) Westpointe Community Council Comments regarding revised North Point Master Plan
Attachments: Hot market for warehouses is driving a trucking ghetto into SLC's last agricultural land and right through the city's draft master plan - Building Salt Lake Nov 2022.html
Importance: High

I regret to report the Board of Directors of the Westpointe Community Council has been unable to meet, consider, and adopt a position statement on the City's latest versions of the North Point Small Area Master Plan (Adoption Draft October & Nov 2022) by today's deadline.

There are a number of reasons why the Board has been unable to act on this critical matter. While the holiday season has made such efforts more difficult, the Board was committed to making the best use of the additional time provided by the Oct. 26th Planning Commission meeting. But first the Community Council needed to respond to a North Point-related rezoning petition from Salt Lake City (PLNPCM2022-000699/00700/007). A three-page memo was prepared outlining the results of a community meeting and vote which was then submitted to the City on November 3. Then the Board needed to complete preparations for the November 9th Board Election. However, the Board completely redid the agenda feeling it needed to fully inform the community of the most recent changes to the North Point planning document (Oct. 2022 version) and of the Planning Commission's actions and expectations.

City staff attended the Nov 9th mtg and responded to the community's pressing questions regarding the revised Master Plan as well as the recently published Notice of Annexation. Our intent was that such an exchange would be the groundwork for a constructive dialogue of alternate planning visions that could better address the concerns raised by residents as well as developers. The meeting generated a spirited but very civil forum. However, the discussion severely limited the election process and resulted in the Board having to void the election.

The board election has not been rescheduled as the Board instead needed to respond to another North Point related matter, the Salt Lake City-County annexation proposal (PLNPCM2021-01124). On November 13, a five-page annexation protest was filed with the County. This effort proved particularly time consuming as neither the County nor the City could agree on who had primary responsibility to handle such a protest. Then on November 16th we received an email with another amended North Point master plan ("Adoption Draft Nov 2022). We were surprised since November 30th was the deadline for community and steering committee comments. In subsequent conversations, we learned that any comments/recommendations people submitted at that time would not be included in any revised plan the staff submitted to the Planning Commission' at their December 15th mtg. Instead, staff would merely include those comments in the staff report. At that point board members became even more hesitant to spend even more time and energy in preparing recommendations on issues that the City had ignored in the past and apparently would not seriously consider in the future.

Given the circumstances, I have chosen instead to submit a copy of the November 11th article in Building Salt Lake by Luke Garrott. This article was distributed to Board members and some other impacted residents for review. It reflects the concerns we have been expressing for some time and which we had hoped could be addressed in the updated

Master Plan. Unfortunately, we concur with Dr. Garrott assessment that the updated plan, when implemented, will result in an “inherently unsustainable and unwalkable land use-a warehouse and trucking ghetto.”

Please include this email and the attached article as part of Westpointe’s official comments to the Planning Commission. At some point I hope the Board will be able to develop a more complete response. Thank you.

Hot market for warehouses is driving a trucking ghetto into SLC's last agricultural land and right through the city's draft master plan

Luke Garrott on November 11, 2022



Pro-development changes in the draft master plan for the Northpoint area, containing large segments of Salt Lake

City's last agricultural land, have riled elements of the public and caused the city's planning commissioners to hit pause.

Staff from the city's Planning Division presented its latest draft of the Northpoint Small Area Plan to the SLC Planning Commission during its last meeting in October.

The plan, set up for a vote at the October 26 meeting, was uncharacteristically tabled after Planning Commissioners balked at giving up on a vision of open space for the former Misty River residential development on 160 acres of farmland adjacent to the Jordan River and I-215.

The meeting exposed a gap between visions for the area – one driven by market demand for warehouse square footage and another by preserving open agricultural space adjacent to a densifying city. Complicating matters are the airport's eventual plans to expand its easternmost runway and the city's ban on residential development near that flight path.



As community members, organizations, and commissioners push back, city planners are finding themselves increasingly squeezed. Ironically, the Northpoint plan is heavy on environmentally responsible design proposals for an area that is trending toward an inherently unsustainable and unwalkable land use – a warehouse and trucking ghetto.

While the plan discusses open space conservation strategies on one hand, planners are insisting that marking private property as open space in the plan's future land use map will result in lawsuits claiming regulatory takings.

Members of the Planning Commission contested that notion, and voted 8-0 to table the plan until community and stakeholder concerns were addressed by planners.

What's the city doing?

The Northpoint Small Area plan was put together by [Logan Simpson](#), a local landscape architect and environmental planning firm.

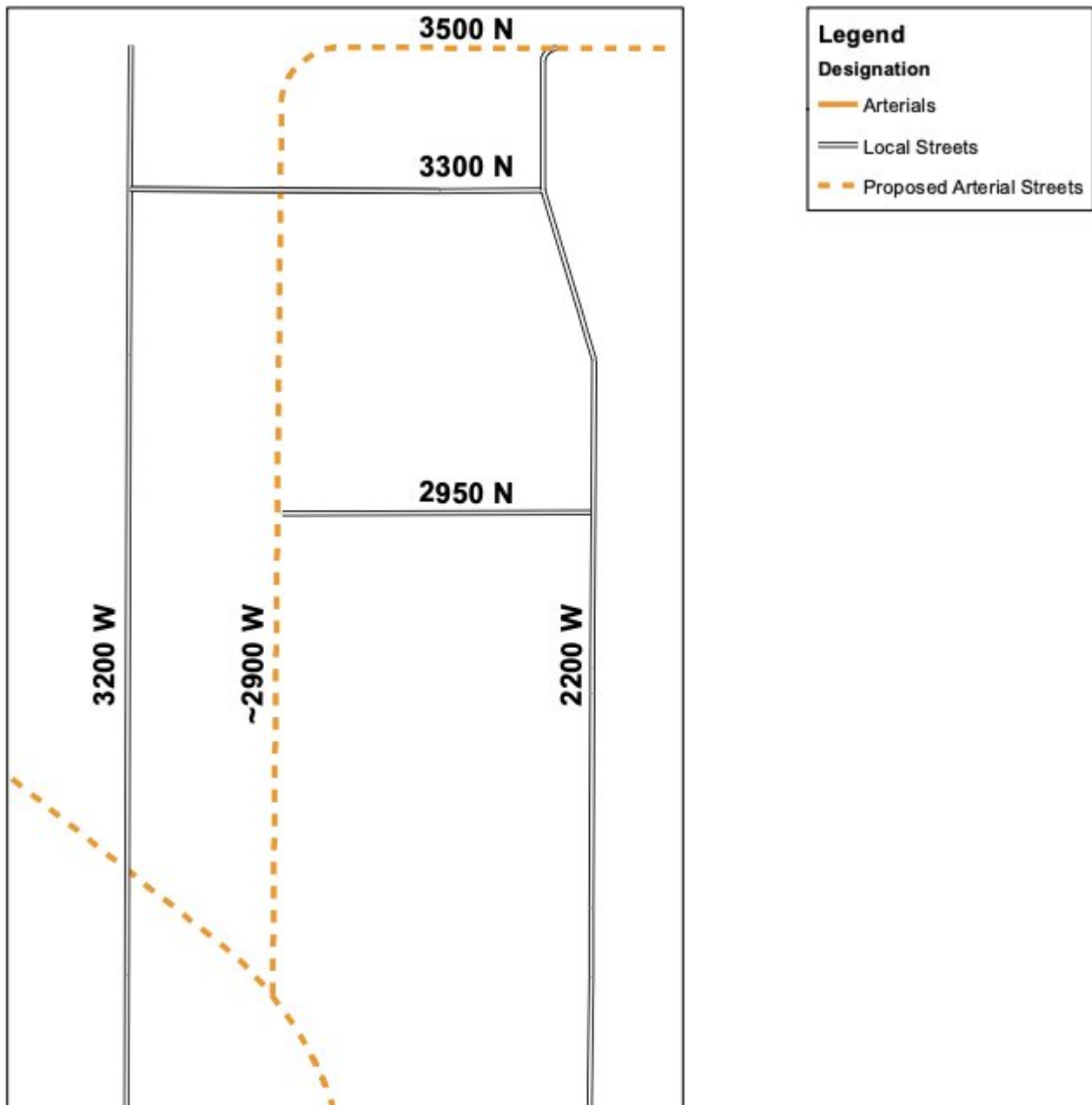
Its first goal is to “identify appropriate future land use and development characteristics for the area that can coexist with the wildlife habitat and natural environment of the Great Salt Lake, and the operations of the Salt Lake City International Airport.”

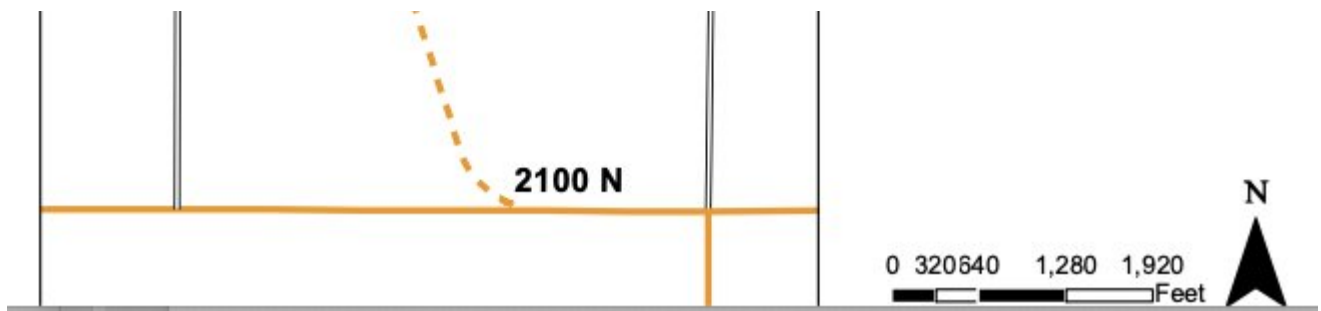
Noteworthy recommendations are phasing out BP Business Park zoning and transitioning AG-2 and AG-5 agricultural zones to M-1 light manufacturing instead. Senior planner Krissy Gilmore's staff report states, “M-1 would support a better mix of land uses (such as the BP zone only allows retail/commercial if associated with a business park), a development pattern that allows for clustering (smaller minimum lot size and width

requirement), and preferred landscaping requirements. The M-1 zone is also subject to the water limit of no more than 200,000 gallons of potable water per day. This water limit does not apply to institutional, residential, or agricultural uses.”

The building of two new arterial roadways – the city’s widest type of street – is also in the plan. The city is preparing to amend its Major Streets Plan to include a new diagonal road originating from 2100 North that will access the airport, as well as a new north-south road at 2900 West.

Salt Lake City Major Street Plan Amendment for Northpoint Area

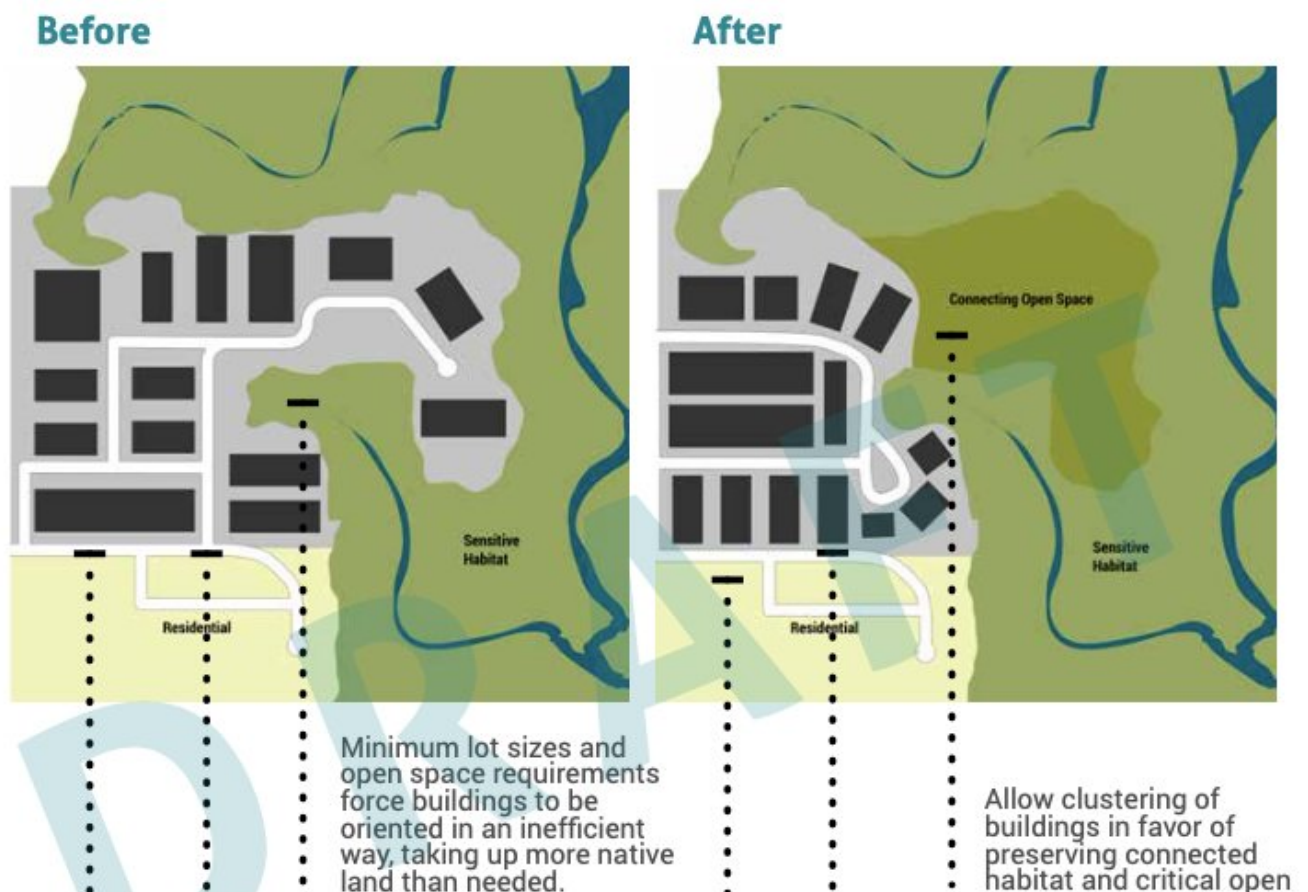


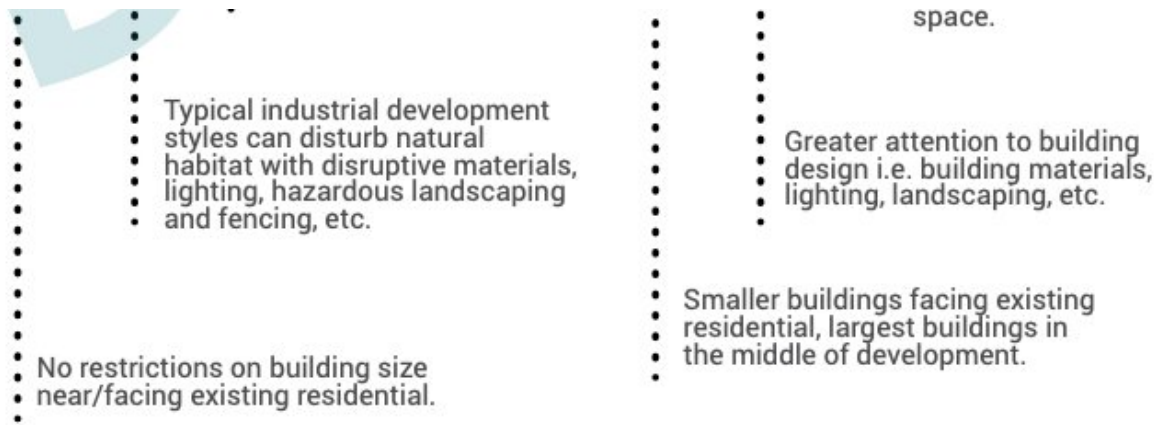


Planning's staff report strangely mentions an intention to "support a multi-modal system" – which from the arterials recommended in the plan seems a far step from reality.

Market reality: "We're already in the deep end"

Part of the attempt to limit impacts on the Great Salt Lake is to contain the footprint of future industrial developments through incentivized, not mandated, clustering of buildings. The plan also proposes limiting the length of those buildings to 400 feet along 2200 West in M-1 and 250 feet in areas marked for transition from agricultural or open space to M-1.





In the plan's latest revision, that transition area is mapped onto the 160 controlled by Dave Tolman (XCEL properties), who is petitioning the city along with other property owners for annexation from Salt Lake County to Salt Lake City. Denied by Salt Lake City's prohibition against housing so close to the airport, Tolman previously tried to annex his property into North Salt Lake municipality in order to build his Misty River residential development.

The yellow-hatched area east of 2200 West is petitioning to be annexed from Salt Lake County (but now to Salt Lake City, not North Salt Lake), which includes Dave Tolman's former 1100-unit Misty River residential site. Warehouse development has already begun in the orange (Swaner) area. Images courtesy the Northpoint Small Area Plan, October draft.

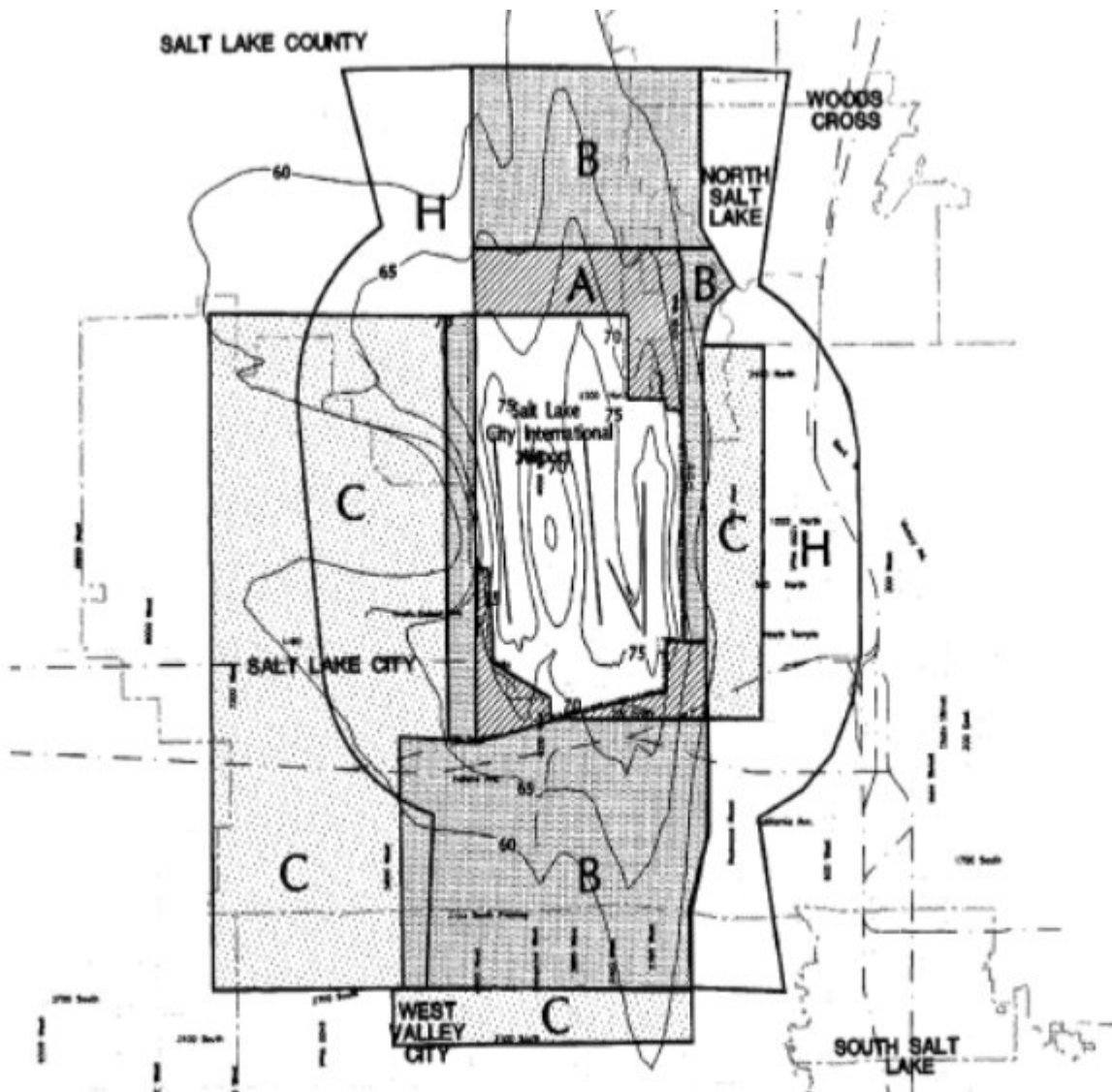
Now pursuing warehouse development on the property, Tolman has flipped back to Salt Lake City. His representative Jason Head told the commission "If the city's intent is indeed to see industrial development in this area, 250 feet and 400 feet simply do not work for modern industrial buildings." Head cited the already-permitted logistics campus by Scannell on the west side of 2200 West "that will have in its first phase a building that is 2000 feet long. We're already in the deep end, and the proposed scale just doesn't work."

The Airport

Another imperious interest has been the SLC Airport, which Planning puts at the head of every priority list concerning Northpoint. Whether it's in the public's interest to expand the airport's runway capacity is a question apparently off the table.

Even if the Airport does expand as planned, it's not altogether clear that federal guidelines would prevent housing being built in Northpoint. Previous statements made by Airport officials to the Salt Lake County Council opposing Tolman's first annexation attempt indicate that what they're most worried about is not public health, but public complaints. Even if people are willing to live close to a runway, officials say they don't want the waves of public complaints that are generated at the country's more urbanized airports.

That ban has shaped Northpoint's present and future as much as the development rights on real property.



Salt Lake City's Airport Flightpath Protection Overlay, from SLC Code.

Yet in the current housing crisis, the city is allowing some housing to be sited in Airport Flight Path Protection Zone B, the same zone that covers much of Northpoint. This has been reflected in city approval of [the transition of motels near the airport](#) into shared-housing apartments for people transitioning out of homelessness.

Other conflicts and contradictions

Conflicting interests have arisen in the city's public engagement process as well.

Many farmers are eager to sell out and move on, yet some are digging in. Westpointe Community Council, which had pressed to preserve open space among other goals, discovered that a significant change was made to the plan since the consultant's last large public meeting in September. Tolman's property, previously visioned as open space, is now marked for transition to M-1.

The interests that intervened in the interim – and perhaps raised threats of takings lawsuits – seem to be driving outcomes, with the proposed plan paving the way. Is the area destined to become a mega-warehouse trucking ghetto as current development trends indicate?



This property will likely be warehouses soon. Photo courtesy the Northpoint Small Area Plan.

Nick Norris noted in an email to Building Salt Lake that the plan calls for a new Northpoint zoning category that would encourage “more manufacturing centric jobs in the area as it transitions while also concentrating development away from waterways, wetlands, and

wildlife habitat.

“As far as the Northpoint area being primarily a logistics center, the recommendations for future zoning regulations for the area are being updated to limit that type of use outside of already entitled projects,” Norris wrote.

So it’s down to a race of the clock. Given the friction at the Planning Commission, and the city’s usual land use change timelines, the likely winners will be market trends and development rights.

[Email Luke Garrott](#)

Interested in seeing where developers are proposing and building new apartments in Salt Lake, or just want to support a local source of news on what’s happening in your neighborhood? [Subscribe to Building Salt Lake](#).

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WESTPOINTE COMMUNITY COUNCIL

Posted by Luke Garrott

December 6, 2022

Kristina Gilmore, AICP, Senior Planner
Planning Division, Department of Community and Neighborhoods
Salt Lake City Corp.

Dear Ms. Gilmore,

Having participated in some of the discussions of the Steering Committee for the Northpoint Small Area Plan, I was surprised and disappointed to see this sudden, last minute hard right turn in the planning process. As the Policy Analyst for Utah Audubon Council, I was encouraged by the earlier direction toward protection of wetlands and open space in this section of the broader Northwest Quadrant master planning area. It now appears that the City is intent upon pursuing a more intensive development pattern similar to that of the Utah Inland Port Authority jurisdictional lands to the west.

The Steering Committee's input and suggestions for conservation buffers to protect sensitive lands and waters and for less industrial/commercial development, and for preservation of some of the existing agricultural uses seem to have fallen by the wayside in the Revised Draft.

Also, as a long-time anti-poverty and low-income housing advocate, I am chagrined that the City would allow for light industrial and warehouse uses that may result in neighborhood degradation, displacement and loss of existing, much-needed naturally occurring affordable housing in Northpoint. This comes at the same time that the City is working on policies to curtail gentrification, mitigate loss of housing, and carefully up-zoning while incentivizing more affordable housing development.

I strongly urge the Planning Division to withdraw, reconsider and revise the Revised Draft before submitting it to the Planning Commission.

Respectfully,

Steve Erickson
444 Northmont Way
Salt Lake City, UT 84103



FRIENDS of GREAT SALT LAKE

150 South 600 East, Suite 5D • Salt Lake City, UT 84102 • (801) 583-5593 • www.fogsl.org

December 6, 2022

To: Kristina Gilmore, AICP
Senior Planner, Planning Division
Department of Community and Neighborhoods
Salt Lake City Corporation

Re: Comments on the Revised Draft of the Northpoint Small Area Plan

I am Executive Director for FRIENDS of Great Salt Lake and served as a member of the Steering Committee for the Northpoint Small Area Plan process. FRIENDS is a membership-based nonprofit 501(c)(3) with the mission to preserve and protect the Great Salt Lake ecosystem and to increase public awareness and appreciation of the Lake through education, research, advocacy, and the arts. I thought this master planning process held promise as an opportunity for the City to demonstrate a model of responsible and informed planning. I was sadly mistaken. Clearly, I'm extremely disappointed with how the City has chosen to move forward with development of North Point. When you involve residents in a planning process, only to turn around and ignore their input, one is left to wonder why we even bothered to participate. The City has received ample feedback confirming the need to address important ecological aspects of the landscape that are missing in the plan. I urge the City to reconsider the decision to move forward with the Revised Draft as written and instead incorporate into the plan's vision the input from the citizens the City encouraged to participate in the planning process.

Recently, Laura Briefer, Director, Salt Lake Public Utilities, wrote an article *Salt Lake City – Environmental Stewardship, Public Service, and Great Salt Lake*.^{*} In her article, Ms. Briefer emphasizes that the Department of Public Utilities has a more than 170-year legacy of environmental stewardship and public service. She points to the Department's "long-standing mission statement, *Serving our Community, Protecting our Environment*, [which] embodies the work ethic of our employees at all levels from line staff to leadership. This ethic has withstood the test of time and has been supported by our residents for many decades."

Unfortunately, such proclamations ring hollow in the face of planning decisions that reflect a different ethic. In light of this extraordinary declaration of commitment from Utah's capital city, it is confounding and disappointing to be confronted with the revisions/omissions in the Revised Draft of the Northpoint Small Area Plan.

The development of critical uplands and wetlands adjacent to the Great Salt Lake poses a subtle, but significant threat. This development is devouring these important natural resources at an alarming rate. It's crucial that we recognize the function these lands play as an essential part of the Lake's ecosystem. As a landscape adjacent to Farmington Bay and Great Salt Lake, these existing lands must be valued as tremendous assets to be preserved. Instead, the City seems to accept outdated development trends and planning limitations as simply a given that does not need to be explained or justified.

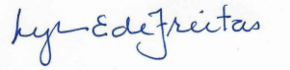
The Revised Draft completely undermines positives such as adequate buffers/setback distances and connectivity of wetland areas that maximize the viability of these irreplaceable natural systems. The last minute addition to support a "North Point specific development code" could have been a promising development if it had been seriously fleshed out with the community. Also, absent is a meaningful commitment to acquire sensitive lands as

The mission of FRIENDS of Great Salt Lake is to preserve and protect the Great Salt Lake Ecosystem and to increase public awareness and appreciation of the lake through education, research, advocacy, and the arts.

open space with passive recreation links to the Jordan River. Additionally, conflicting re-zoning and annexations proposals, concurrently advanced by the City, further undermining the master plan visioning process. It's no wonder that area residents and stakeholders are dismayed by this long-awaited master planning process that was intended to serve as the foundation for the future—one that resolves rather than exacerbates existing problems.

Thank you for your consideration of these comments.

In saline,

A handwritten signature in blue ink that reads "Lynn de Freitas". The signature is written in a cursive, flowing style.

Lynn de Freitas
Executive Director

* Quotation source: Autumn 2020 Vol. 27 No. 4 FRIENDS of Great Salt Lake Newsletter

To: Kristina Gilmore, AICP

December 2, 2022

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

I am a wetland ecologist specializing in environmental stressors, wetland condition assessment, and avian habitat preservation and restoration. I am currently employed by Audubon Rockies, a regional office of National Audubon Society and am based at the Gillmor Sanctuary on the South Shore of Great Salt Lake.

Great Salt Lake wetlands are unique to this region and there are very few places like them on Earth. We are in the midst of an historic ecological crisis for Great Salt Lake and the wildlife that depend on it with the ongoing drought. Lake levels have dropped to an historic low and the standing pool that remains is becoming more and more saline, threatening and ecological collapse. Now more than ever, managed and other wetlands around the lake are becoming increasingly important – particularly for migratory birds of the Western hemisphere. Great Salt Lake and its wetlands are recognized for their value to shorebirds as a designated site of the Western Hemispheric Shorebird Reserve Network. Additionally, many of the wetlands of Farmington Bay and the South Shore of Great Salt Lake are designated migratory bird production areas by the Utah Legislature, including the Rudy Duck Club, which is immediately adjacent to the Plan Area. Further, wetlands of all bays of Great Salt Lake are recognized as Globally Important Bird Areas by BirdLife International and National Audubon Society. My comments focus on the need for special consideration for wetlands associated with the lake and water that is critically important for its future.

- 1) Page 7: Plan Context and Purpose, First Goal: “Identify appropriate future land use and development characteristics for the area that can coexist with the wildlife habitat and natural environment of the Great Salt Lake, and the operations of the Salt Lake City International Airport.”
 - a. It isn’t clear that this first goal is carefully considered throughout the plan. Alternatives to development are presented well in Chapter 4 and appendices, but these tools are not presented as viable options elsewhere in the plan document. This is an unfortunate imbalance, particularly when most of the Plan Area is not suitable for development according to Graphic 2.1 Constraints Analysis, page 14.
 - b. The vision map on Page 16 (and language enabling reduction of buffers of wetlands and sensitive areas, addressed later in my comments) places business park zoning juxtaposed to Great Salt Lake wetlands. Where is the alternative vision map showing application of development tools, highlighted in Chapter 4 that would actually conserve important habitat value and function of this sensitive and productive wildlife area of the lake? I understand that Design Standards in the plan can be applied within the business park zone, but doubt very much the setbacks and buffers as presented will adequately protect the wetlands and wildlife. I appreciate the fencing, walls, dark sky lighting and water conservation standards, however, the setbacks and buffers need to be more stringent around the natural wetland and water features (as addressed below). How can alternatives development tools be fully appreciated and envisioned without proper attention up front?
- 2) Page 16: 1st paragraph – “The Plan Area...is nestled between wetland spillover from the Great Salt Lake...”
 - a. Please delete “spillover” as it implies excess, wasted, low value, and is certainly not an ecological term.

- 3) Page 18: Design Standards, First section: Setbacks and Buffers
 - a. What criteria were used to identify setback distances?
 - b. Minimum setbacks of new development for wetlands, the Jordan River, canals and drains are far too short, leaving inconsequential land left for buffering functions. Setbacks are not equivalent to natural buffers and should not be used interchangeably. The developed features prescribed for the setback areas preclude certain functions that a natural buffer would provide (eg., wildlife habitat, wildlife refugia during floods, flood attenuation, soil compaction, distancing from anthropogenic disturbance to nesting birds and other wildlife from business park and light industrial activity). Disturbances such as noise, air quality, lighting (if not dark sky friendly), and human and vehicular activity are all difficult to impose at close proximity to sensitive wildlife areas without negative impacts to wildlife and their habitat. Blueprint Jordan River includes much broader, ecologically sensitive buffers of at least 300 feet for the best wildlife and habitat protection.
 - c. Page 19: Preferred Buffer for Development Adjacent to Wetlands/Uplands graphic illustrates the over-reach implied by stormwater management elements as a buffer component that benefits wetlands and wildlife.
- 4) Page 32: Evaluate the Feasibility of Acquiring Sensitive Lands as City-Owned Open Space
 - a. In addition to lands adjacent to the Jordan River mentioned in the text, open land along 3200 W should also be listed as it is already used for passive recreation and would tie in to the Jordan River trail way system.
- 5) Page 35: Buffer requirements
 - a. From paragraph 1: "The Plan identifies up to a 200 foot buffer from wetland areas. This should be implemented through either an update to the City's existing Riparian Overlay Zone or a new Northpoint specific development code."
 - i. Wetlands of Great Salt Lake are very different from riparian areas and should be treated as such by developing a new Northpoint specific development code. Great Salt Lake wetlands adjacent to the Plan Area do not have channels and stream banks nor flowing rivers with tree canopies that are found in riparian areas. The wetlands have relatively flat topography, which means the smallest rise in water levels covers a great distance of open area and they are subject to more exposure to disturbances from anthropogenic activities and development due to that flatness.
 - b. Paragraph 2: "In developing the updated code, the City should consider identifying priority wetland areas and applying the maximum buffer to the highest priority wetlands. Reduced buffer widths may be appropriate based on the condition, function, and goal of the specific wetland buffer. Additionally, the City should allow flexibility of wetland buffers through incentive based tools. For example, the buffer width could be reduced through mitigation measures that include native vegetation restoration."
 - i. Regarding "highest priority wetland areas", any wetlands associated with Great Salt Lake should rank in the highest priority. The connectivity of wetlands with Great Salt Lake for wildlife and hydrology are inextricable and cannot be mitigated by "native vegetation restoration". Simply put, they are irreplaceable and cannot be reconstructed or relocated elsewhere. The wetlands bordering the west side of Northpoint Small Area should be treated delicately and provided a minimum buffer of 300 feet, which can be backed by studies that consider ecological preservation and the other functions that wetlands provide (eg., groundwater recharge, improved water quality, flood attenuation, dissipation of noise, motion, and light disturbances to wildlife, and many habitat benefits to wildlife). Likewise, the Jordan River should also be treated as highest priority as it is a major source of water to Great Salt Lake and its wetlands with a 300 foot buffer (highest quality buffer recommended in Blueprint Jordan River).

- ii. Condition assessment of playas is extremely difficult as they are considered “atypical” of any wetland type. While the elevation of land within the Plan Area lies above 4212 feet, there is an important function that the centrally located playa and drainage courses (old channel meanders visible in aerial imagery) in the Plan Area provide: **refugia** during high precipitation years. Many shorebird species require shallowly flooded to moist mudflat habitat for forage, nesting and staging. When water levels are high, much of this habitat type is too deep and inaccessible so refugia areas need to be conserved – even in long term drought periods. We need to be planning for future communities beyond our own time on the planet, particularly since many shorebird populations are in decline (State of the Birds Report, 2022). We do not recommend reducing buffers around natural wetland and river features within the Plan Area as they are ecologically important to the surrounding ecosystem. These features are clearly shown in the wetlands constraint map of the Northpoint Opportunities section.

2) Page 67: Typos in Irrigation Canal section

- a. “Greater” should be Great Salt Lake
- b. “Salt Lake City Canal Sewage” should be Salt Lake City Sewage Canal

Thank you very much for the opportunity to provide comment on the November draft of the Northpoint Small Area Plan. As a Steering Committee member, I have followed and contributed to the process and appreciate the careful consideration of my comments. If you need more information regarding wetlands and wildlife buffers for the Plan Area and adjacent lands, I’d be happy to assist.

Sincerely,

Heidi M. Hoven, Ph.D.

Conservation Specialist
Gillmor Sanctuary

National Audubon Society

231 W 800 S, Ste E
Salt Lake City, UT 84101


rockies.audubon.org/gillmor

To:

**Salt Lake City Corporation
Planning Commission**

Dear Members of the Salt Lake City Planning Commission,

My name is Eric Orme and I have served on the steering committee for this Small Area Plan. I would like to thank you for your consideration and understanding from the previous meeting and for requesting to take a more thorough look into 'designated wetlands' as included in the Small Area Plan and what its severe impact would be on just five smaller property owners. I am also one of these smaller property owners.

You should have received a letter (but also enclosed herein) from Newfields, a wetland consulting company that we have retained to analyze potential wetlands and specifically, the impact on the five properties. In their letter, they have provided multiple weaknesses regarding the "designated wetland" area as defined (or not defined) in the Small Area Plan. A lot of their questions posed are still left unanswered. Some of which include:

- Does 'designated wetlands' refer solely to wetlands that are federally jurisdictional under the Clean Water Act?
- What are the specific and science-based objectives for the wetland buffers?
- What is the criteria for establishing buffer values?
- What is the process for evaluating and determining the presence/absence of 'designated wetlands' and waters?
- How would a wetland delineation report provided by a land owner impact the overall Plan and the provided mapping?
- If a property owner doesn't have wetlands on their property but may be affected by the buffers associated with a mapped wetland on an adjacent property, how will the buffer be evaluated? What are the responsibilities of such an affected property owner as they have no right to access or delineate wetlands property that they do not own?

As a guide to aid in writing the plan as it pertains to 'designated wetlands', the planners and consultants used a document entitled "Planners Guide to Wetland Buffers for Local Governments, Environmental Law Institute, 2008". On buffer distances, it states that buffers are significantly under-researched and problematic. The new draft states the City will impose 'designated wetland' buffers "Up to 200 ft". How will the specific size of a buffer ultimately be determined for an individual property? What specific criteria will be established for specific buffer values? When will that be established in this Area Plan process?

I have included a map herein (Exhibit 2) which illustrates the two potential wetland areas that the buffers in the area plan set out to protect. I say potential because the boundaries of the two "designated wetland" areas have never been delineated or corroborated by the Army Corps of Engineers. As the map illustrates, the wetland buffers will not achieve their goal around nearly 93% of the two potential wetlands in this area. The majority of the property that borders the potential wetland areas have received full entitlements from the City and are not subject to any buffers under this Small Area Plan (Swaner/Scannell Development). This limits the wetland buffers in the plan to only ~7% of the potential wetland border, which would be unfairly imposed on only 5 smaller property owners (See Exhibit 1).

In the newest edit to the draft plan, on page 16, the plan added an unclear definition of wetlands as they pertain to the plan. It states "Wetlands include both jurisdictional and non-jurisdictional wetlands." Jurisdictional wetlands are regulated federally by the Army Corps of Engineers under the Clean Water Act. Non-jurisdictional wetlands are not regulated federally under the Clean Water Act. Does Salt Lake City plan to regulate non-jurisdictional wetlands? Does the City have staff qualified to make these determinations? I don't think Salt Lake City intends to self-regulate non-jurisdictional wetlands. More clarity needs to be presented. Will the term 'designated wetlands' refer to those wetlands that are federally jurisdictional under the Clean Water Act? The plan still remains deficient in its definition of 'designated wetlands'.

Exhibit 1 shows a detailed map of how the designated wetland buffers would severely impact 5 smaller properties, as the plan is currently written. These properties are located along the west side of 2200 W between 3000 N. and 3300 N. On page 19 of the Small Area Plan it reads, "When buffer is applied during development of a property the City must consider the potential for a regulatory taking of property." Although it was most likely unintentional, these 5 smaller properties are being unfairly targeted by the designated wetland buffers. How is the City preparing to deal with the Regulatory Taking of Property that are likely to result from the implementation of this Plan? It should be questioned whether the wetland buffers are really achieving any goal as written. If you look at the previous version of the draft (See June 2022 draft), the vision map better illustrates what the intent of the planners was in the wetland buffers; to protect the wetlands west of 3200 West. This is clear, as the Major Streets Plan Amendment (Appendix E), proposes two new roads, 2900 W and 2950 N, slated to be built on top of the same wetland area that buffers would be stripping away property rights from the 5 properties mentioned previously. How does Salt Lake City justify building new roads directly on top of potential wetland, but impose an excessive buffer, stripping property rights of up to 50% of one's property as illustrated in Exhibit 1, herein.

I would request from Salt Lake City Planning Commission to strongly consider the weaknesses in this draft plan in regards to 'designated wetlands' in the Small Area Plan as it is currently written. The edits from the previous draft create even more confusion and provide less clarity around 'designated wetlands' and the goal behind buffers and buffer values. Ultimately, any goal around 'designated wetlands' won't be achieved as the majority of the land that surrounds them already has full development entitlements. Is this the City prepared to implement these designated wetland buffers which will likely result in a regulatory taking of property targeted at just 5 smaller properties in the Small Area Plan?

Regards,

Eric Orme
Steering Committee Member
Property Owner


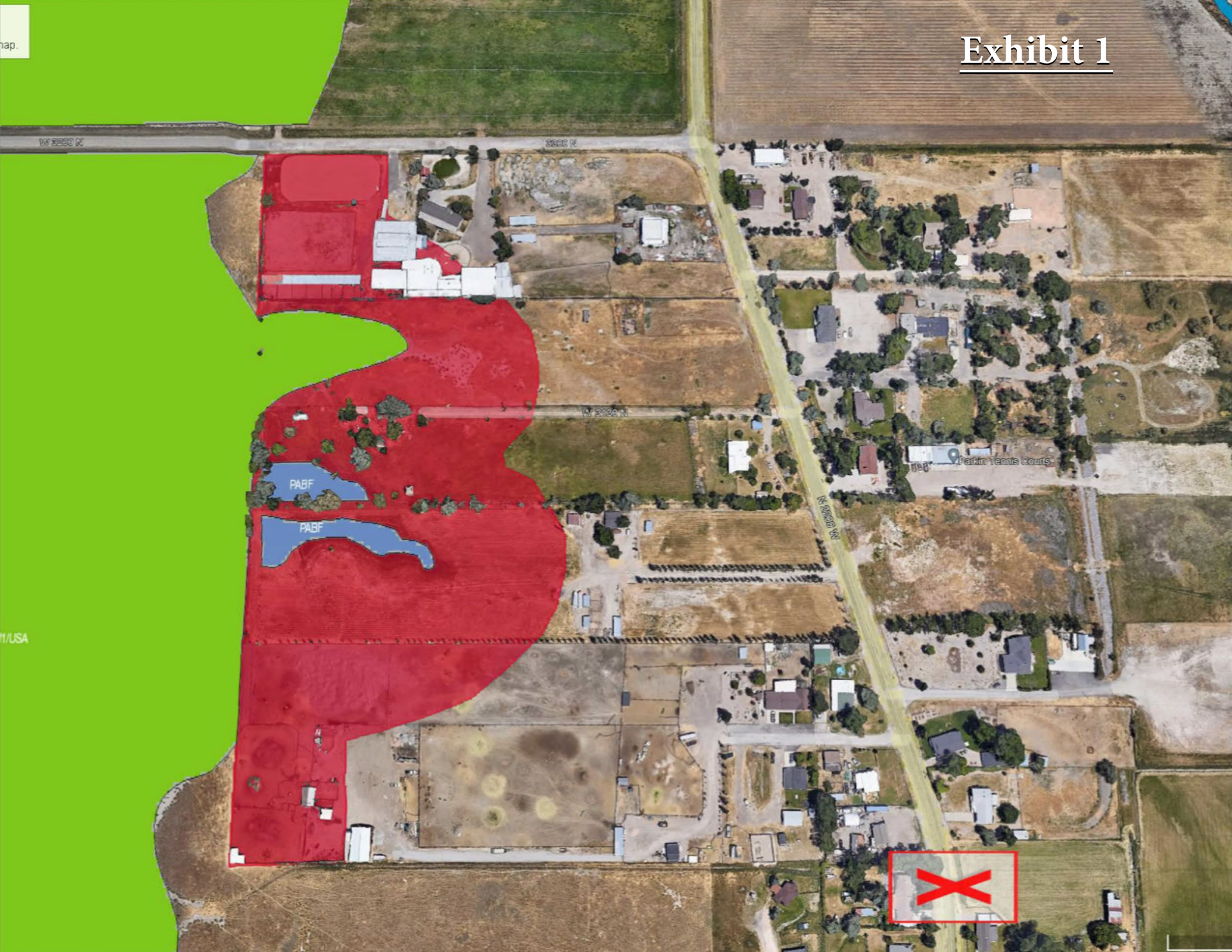

3215 N 2200 W
Salt Lake City, UT 84116

Exhibit 1



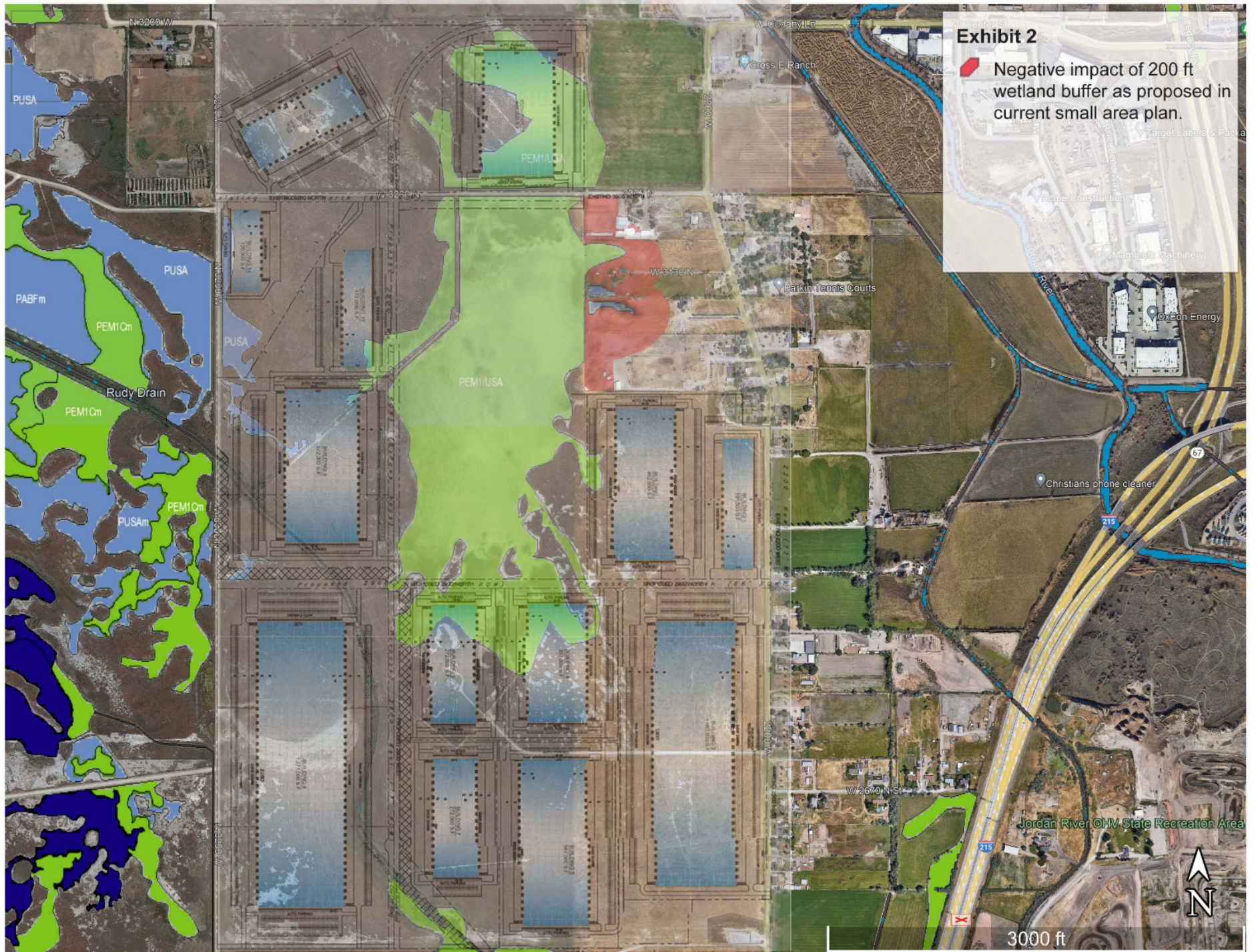



Exhibit 2

 Negative impact of 200 ft wetland buffer as proposed in current small area plan.

To:

Ms. Krissy Gilmore, Senior Planner
Salt Lake City Corporation
Department of Community and Neighborhoods
Planning Division
451 S. State Street, Room 406
P.O. Box 145480
Salt Lake City, UT 84114-5480
Kristina.Gilmore@slcgov.com

Date: November 10, 2022

Re: Comments on Salt Lake City Northpoint Small Area Plan

Dear Ms. Gilmore,

The intent of this letter is to provide you with feedback on the Northpoint Small Area Plan, Salt Lake City Adoption Draft, October 2022 (Northpoint Plan or Plan) specific to:

1. Definitions of Wetlands
2. Landowner Participation
3. Buffer Area Sizing and Composition

NewFields, a multinational environmental consulting company, has been retained to represent certain property owners that would be directly affected by the policy decisions established in the Northpoint Small Area Plan for Salt Lake City. Specifically, NewFields was retained to delineate any waters and wetlands potentially under jurisdiction of the US Army Corps of Engineers (USACE) that may occur on the properties. The reports from this work have not yet been finalized though are relevant to the review and discussion of the Northpoint Plan. For your records, the resume of our chief author has been included as an attachment for summary of qualifications for providing this feedback and these comments.

1. Comments on Wetland Definitions

As drafted, the Northpoint Small Area Plan, Salt Lake City Adoption Draft, October 2022 requires a minimum setback for new development dependent on the land use- with a 200-foot setback for business park/industrial and 75 feet for transitional uses from 'designated wetlands/uplands'. However, the Plan does not provide a definition of designated wetlands/uplands which limits the landowner and developer to a map for assessing the impact adoption of this Plan would have on their individual property rights and plans.

The Northpoint Plan discloses the source for the wetland mapping is the Utah Geological Survey (<https://geology.utah.gov/apps/wetlands/index.html>) that utilizes the National Wetlands Inventory



(NWI) which was developed and maintained by the U.S. Fish and Wildlife Service (USFWS). While the NWI is commonly regarded in the industry as a resource in performing wetland delineations, it is also known that this resource generally overestimates the presence of waters for regulatory purposes and is limited in its capacity to accurately identify local wetlands and their boundaries. For the areas specifically identified in the Northpoint Small Area Plan boundaries the NWI data source has the following data limitation stated:

Due to year-to-year and seasonal water-level fluctuations, data users are reminded that the information here represents conditions observed during the summers of 2014, 2015, and 2016. Current conditions will be dependent on weather and climate fluctuations as well as land management.

Because this resource does not represent real-time data the current vision plan is based on data that is 6-8 years old, and thus not reflective of the site conditions that exist today or into the future. Many regulatory agencies require that field conditions be verified/reverified every five years to ensure site conditions have not changed. Please describe how the mapping of designated wetlands will be kept current.

The Utah Geological Survey states on their website that they utilize a broader wetland definition that aligns with the USFWS, which is a resource agency that has no regulatory responsibilities with regard to wetlands. The US Army Corps of Engineers (USACE) is the aquatic resource regulatory agency for wetland and other waterways in Utah and across the nation. There are significant differences between how the USFWS, and thus the Utah Geologic Survey, and the USACE define wetlands. The Plan does not specify or adopt any specific definition or specify any regulations that point landowners to which wetland definition applies or how it is being regulated. Further, the Utah Geological Society provides the following disclaimer on its wetland mapping website:

This product represents a compilation of information from both the Utah Geological Survey and external sources. The Utah Department of Natural Resources, Utah Geological Survey, makes no warranty, expressed or implied, regarding its suitability for a particular use. The Utah Department of Natural Resources, Utah Geological Survey, shall not be liable under any circumstances for any direct, indirect, special, incidental, or consequential damages with respect to claims by users of this product.

Wetlands spatial data were produced from a combination of aerial imagery examination and on-the-ground assessment and are not meant to be used as the basis for a jurisdictional wetland delineation. Wetlands across much of the state were mapped in the 1980s at a coarse resolution; some wetlands may have been inadvertently omitted and other wetlands may no longer exist or may not be considered jurisdictional. Please contact your local U.S. Army Corps of Engineers office if you are unsure of the status of a wetland on your property.

The Northpoint Plan is deficient in its definition of wetlands, designated or otherwise, and there is no description of the process of how designated wetlands are designated or undesignated based on real-time, on-the-ground data.

Please clarify whether the term ‘designated wetlands’ refer to those wetlands that are federally jurisdictional under the Clean Water Act, or if the City intends to regulate wetlands based on the Utah



Geological Survey's broader application of the term wetland regardless of the federal designation.

To aid the City reviewers, the following questions/comments are summarized from this section:

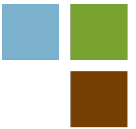
- What is the definition of 'designated wetlands' refer to those wetlands that are federally jurisdictional under the Clean Water Act, or if the City intends to regulate wetlands based on the Utah Geological Survey's broader application of the term wetland regardless of the federal designation.
- Does 'designated wetlands' refer solely to wetlands that are federally jurisdictional under the Clean Water Act,
- Does the City intend to regulate wetlands based on the Utah Geological Survey's broader definitions?
- What is the process for evaluating and determining the presence/absence of 'designated wetlands' and waters?

2. Comments on Landowner Participation

Currently, the Northpoint Plan does not include procedures that invite or include landowners into the process to identify wetlands or other sensitive areas on their property. Please describe the elements of flexibility incorporated into the Plan that would allow a property owner to provide professionally generated information regarding the presence or absence of wetlands or other sensitive areas on their property. Also please describe the process for having Plan mapping updated to reflect those findings.

Additionally, even if wetlands are present on a property that wetland(s) may not be federally jurisdictional for several reasons, but as the authority for the City to regulate wetlands isn't identified in the Plan, it is unclear to a property owner if the federal jurisdiction take primacy. The following questions are generated based on this feedback on the current version of the Plan:

- What is the specific definition the City is applying to wetlands/designated wetlands?
- Is there a plan for a property owner to have their property delineated for wetlands and to whom would a delineation be provided to for concurrence?
- Does the City have staff qualified to review/approve these delineations?
- Please clarify whether the City developed a protocol for delineating wetlands, if not, would they be relying on state or federal protocols? Which one?
- Does the Plan assert authority over wetlands and waters that are not regulated under the Clean Water Act? Is the City regulating wetlands that may be excluded under Utah State laws? If so, please provide the authorities for these regulations.
- How would a wetland delineation report provided by a land owner impact the overall Plan and the provided mapping? Will these feed into the base mapping provided by the Utah Geological Survey and others?
- If a property owner doesn't have wetlands on their property, but may be affected by the buffers associated with a mapped wetland on an adjacent property, how will the buffer be evaluated? What are the responsibilities of such an affected property owner as they have no right to access or delineate wetlands property that they do not own?
- Is there any appeals process for any portion of the current Plan?
- How is the City preparing to deal with the Regulatory Takings that are likely to result from the implementation of this Plan?



- What is the process of addressing designated wetlands or “sensitive landscape” identified in the provided mapping that may be inaccurate or incorrect?

3. Comments on Buffer Areas and Composition

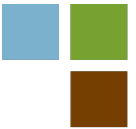
The Plan is unclear on the criteria used to identify the buffer/setback requirements and for describing how buffer quality might be considered. The Plan states that the desired outcome of the buffers is to “reduce impacts to the environmental features and wildlife habitat associated with the Great Salt Lake.” Meanwhile, objectives stated elsewhere, including in email communications with the public, identify the objective as stormwater and pollution protection, which is not discussed or disclosed in the current Plan.

Please provide specific objectives for the wetland buffers as these are needed to determine appropriate buffers. The reference provided for the buffer sizes, “Planners Guide to Wetland Buffers for Local Governments, Environmental Law Institute, 2008” which speaks extensively on this very topic. Buffer sizes should be scientifically supported to meet the specific objectives that should be identified in the Plan. While it is unclear what the Plan defines as “environmental features” of wetlands or if this includes stormwater and pollution protection, the reference identified in the Plan found 100 to 160 feet buffers effective for nitrogen removal based on an evaluation of the scientific literature through 2008 and this variance appears to be attributable to the composition of the buffer and site-specific characteristics, such as soils.

The stated wildlife habitat objective is broad and no specific wildlife of concern has been identified in the plan, it is unclear how any recommendation could be based on an objective this general, so clarification is requested. Further, assigning a fixed setback to protect wildlife habitat without consideration to the type or composition of the buffer does not provide incentive for property owners or developers to offer higher value, targeted enhancement buffers as there is no information regarding the wildlife species these buffers are intended to protect and promote. Further, a Plan-cited resource from 2008 on buffer distances states buffers are significantly under researched and problematic. Please provide science-based rationale for buffers otherwise those prescribed in the Plan have the appearance of being arbitrary.

Comments and questions summarized in section 3:

- What are the specific and science-based objectives for the wetland buffers?
- What species are the buffers intended to protect?
- What is the criteria for establishing buffer values?



We intend to submit more in-depth comments on the topic of buffers to the Planning Commission by November 30, 2022, and in the interim request any subsequent revisions of the Plan consider and address these comments.

Thank you for the opportunity to comment and thank you, in advance, for your time and consideration of these public comments. Should you have any questions about these comments, please feel free to contact me at jthomason@newfields.com or at 775-525-0384.

Respectfully,

Jennifer Thomason
Senior Environmental Scientist

cc:

Nick Norris – Director, Planning Division Nick.Norris@slcgov.com

Attachment: Jennifer Thomason Resume

Jennifer Thomason

Project Manager/Senior Environmental Scientist

jthomason@newfields.com



Quick View Professional Summary



Education and Experience

B.S., Environmental Science, Morehead State University, Kentucky

Emphasis in Regional Analysis and Public Policy

U.S. Army Corps of Engineers-Senior Regulatory Project Manager for the Nevada Field Office

U.S. Army Corps of Engineers- NEPA Program Manager for the U.S. Army Reserves Nationwide Environmental Program.

U.S. Army Corps of Engineers – Water Quality Biologist

Areas of Expertise

Clean Water Act- Permitting Strategies, Jurisdiction, Compensatory Mitigation and Compliance
National Environmental Policy Act

EXPERIENCE SUMMARY

Ms. Thomason is an experienced Project Manager/Scientist who worked 14.5 years with the U.S. Army Corps of Engineers, where she served in several scientific and project management roles. Her unique work experience has demonstrated her ability to provide support during all phases of development, from project conception all the way through post construction compliance. She is adept at working with construction staff to develop solutions to environmental issues before they arise in order to maximize productivity. Ms. Thomason's most recent role with the Corps of Engineers, prior to her onboarding with NewFields was as Senior Regulatory Project Manager for the Nevada Regulatory Field Office where she was the primary point of contact for all Clean Water Act Section 404 permitting activities

throughout the state of Nevada and the Lake Tahoe Basin.

Relevant Experience:

Ms. Thomason began her career in June 2005 as a Biologist for a private engineering firm. She served as a Project Manager for environmental studies and permitting for the coal mining industry in the Central Appalachian Region of eastern Kentucky and western West Virginia. In this position Ms. Thomason developed her skills in performing aquatic resource delineations, development of stream compensatory mitigation plans, and authoring technical reports for various regulatory agencies.

Ms. Thomason began working for the US Army Corps of Engineers in the Louisville District as a Project Manager for the Regulatory Branch in August 2007. During her term in this roll, she worked at both the Eastern Kentucky Regional Field Office in Sassafras, Kentucky and at the District Office in Louisville, Kentucky. She has experience in assessing the functions of freshwater habitats including streams and wetlands and expertise in benthic macroinvertebrate sampling design, environmental assessments and compensatory mitigation planning for stream systems. While serving in this role she was directly involved in the U.S. Army Engineer Research and Development Center's development of the *HGM approach for assessing high-gradient ephemeral and intermittent headwater streams in Western West Virginia and Eastern Kentucky*. Ms. Thomason became an instructor for the Louisville District Regulatory Branch for utilizing this HGM approach. Through this position Ms. Thomason was exposed to the whole planning process for a wide variety of projects including coal mining, natural gas pipelines, residential and commercial developments and dredging.

Jennifer Thomason
Project Manager/Senior Environmental Scientist



In December 2013, Ms. Thomason began working as a biologist in the Louisville District's Engineering Section of the Environmental Branch, Water Quality Program. In this role, she served as the harmful algal bloom (HAB) response plan coordinator in Indiana, Kentucky, and Ohio; data management specialist; and technical manager on various water quality program related contracts. In this role Ms. Thomason specialized in environmental study design, environmental data management and analysis, and multiple-disciplinary team development and leadership. In this capacity, Ms. Thomason led two environmental studies that led to her contribution in professional publications of the results.

In December 2017, Ms. Thomason also became a Contracting Officer's Representative and the Lead Technical Manager for Louisville District in all work related to the nationwide U.S. Army Reserves environmental programs for military construction, real property exchanges, and property disposals. In this role she worked with the U.S. Army Reserves environmental program managers to ensure compliance with NEPA and other environmental laws and regulations for projects across the nation and U.S. territories. In this role Ms. Thomason oversaw the contracting procedures for various environmental reports and studies and reviewed all submission for compliance with the federal regulations. Through this experience Ms. Thomason worked with design, construction, and design-build teams to address a variety of environmental issues, concerns, studies, and regulations.

Ms. Thomason came to Nevada in January 2019 as the Senior Regulatory Project Manager in the Nevada Regulatory Field Office to return to her roots in the Regulatory program. In this role she was the primary point of contact for all Clean Water Act Section 404 permitting activities throughout the state of Nevada and the Lake Tahoe Basin.

During Ms. Thomason's tenure with the U.S. Army Corps of Engineers she also served as a Project Delivery Team member for the Debris Mission for the organization in both the Louisville and Sacramento Districts. In this capacity Ms. Thomason served as the Office Engineer and Resident Engineer during the debris mission for Hurricanes Irma and Maria in the U.S. Virgin Islands and as the NEPA Officer for the Hurricane Michael Response in southwest Georgia. In these roles Ms. Thomason was responsible for a variety of tasks including logistics for all personnel matters in receiving a rotating crew of mission support team members, overseeing the work being completed under multi-million dollar contracts, scoping debris management contracts, and overseeing debris management operational compliance with environmental laws and regulations.

Relevant Project Experience:

Pittman East Detention Basin; City of Henderson, Henderson, NV; March 2022. Senior Environmental Scientist. Responsible for documenting project compliance with the U.S. Army Corps of Engineers Nationwide Permit Program, including project compliance with Section 7 of the Endangered Species Act and Section 106 of the National Historic Preservation Act. Provided technical report with summary of all biological, aquatic resource, and cultural resources investigations to support the permitting documentation and recommendations.

Nevada Regulatory Field Office Manager; US Army Corps of Engineers; Entire State of Nevada; January 2019-February 2022. Senior Project Manager. Responsible for primary Clean Water Act Section 404 Permit reviews of all projects within Washoe, Carson City, Douglas, Storey, Elko Counties, and the entire Lake Tahoe Basin on both the Nevada and California sides. Served as the Subject Matter Expert for the



Regulatory Program in Nevada and the Lake Tahoe Basin. In this capacity ensured hundreds of projects located in these areas followed the regulations and policies enacted under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act including NEPA, Section 7 of the Endangered Species Act, Section 106 of the National Historic Preservation Act, Tribal Trust, and Section 14 of the Rivers and Harbors Act. In 2021 Clark County was added to the area of responsibility. Served as the primary point of contact for all pre-application meetings, facilitated monthly interagency pre-application meetings for dozens of projects across Nevada and the Lake Tahoe Basin. Served as the senior reviewer and representative signatory for all other projects in Nevada during this time. Projects included individual permit-level reviews with and without compensatory mitigation requirements, letter of permission-level reviews with and without compensatory mitigation requirements, nationwide permit-level with and without compensatory mitigation requirements, aquatic resource verifications, preliminary jurisdictional determinations, approved jurisdictional determinations, compensatory mitigation monitoring reports, maintenance exemptions, and no permit required determinations. Development of Memorandums of Understanding with the Nevada State Historic Preservation Office and affected tribes for projects with adverse effects to historic properties. Conducted various training workshops for the public and agencies on changing regulations and regulatory policies. Served as the primary face of the agency in Nevada and the Lake Tahoe Basin.

Nevada Air National Guard Base; US Army Corps of Engineers; Reno, Nevada; January 2020. Senior Project Manager. Served as the principal investigator and delineator on behalf of the U.S. Army Corps of Engineers- Chicago District for delineating all aquatic resources located on the Nevada Air National Guard Base property located at the Reno-Tahoe International Airport. Conducted the field work to support and authored the aquatic resources delineation report for the U.S. National Guard Bureau customer. The report was adopted by the U.S. National Guard Bureau to serve as a national template for all aquatic resource delineations being conducted nationwide.

US Army Reserve Center and Aviation Support Facility; US Army Reserves Environmental Command; Tampa, Florida; 2017. Contracting Officer Representative and Lead Technical Manager. Lead a multi-disciplinary team of contractors to complete the NEPA compliant Environmental Assessment, aquatic resources delineation and jurisdictional determination report, US Army Corps of Engineers-Jacksonville District Clean Water Act Section 404 permit authorization and Florida state permits for the construction and operation of a new helicopter bed down area and support facilities for a new US Army Reserve component on the MacDill Air Force Base. This work included scoping the project needs for the customer, contracting to qualified environmental contractors, review of the fieldwork supported documents, coordination between the US Army Reserves and US Air Force environmental teams, coordination between the environmental contractors and the design-build team, coordination between the US Army Corps of Engineers-Louisville District and Jacksonville District Commanders, and the various state and local regulatory agencies.

Hurricane Michael Debris Mission; US Army Corps of Engineers; Albany, Georgia; March 2019. NEPA Officer. Conducted monitoring oversight of six temporary debris disposal sites located across southwest Georgia to support the removal of storm-generated debris that resulted from Hurricane Michael. Conducted weekly site visits to each of the locations to ensure the contractor-operated sites were being controlled in compliance with the conditions approved by FEMA and US Army Corps of Engineers

Jennifer Thomason
Project Manager/Senior Environmental Scientist



contract requirements. This included monitoring for endangered species, namely the Gopher Tortoise, that were known to utilizing a burrow adjacent to the haul road for one of the disposal sites. Conducted baseline environmental evaluations for newly proposed temporary and permanent debris disposal sites that were proposed for use by the contractor. This included evaluating sites for the presence of jurisdictional waters, endangered species, cultural resources, groundwater, or any other environmental issues/concerns that may deem a site ineligible for debris disposal based on FEMA and US Army Corps guiding documents and principals. Conducted site assessments for the return of properties to landowners following site restoration by the contractor, including documenting disputes of baseline conditions and conditions of release.

From: Jack Ray <[REDACTED]>
Sent: Thursday, December 1, 2022 7:20 AM
To: Gilmore, Kristina
Cc: Justin Dolling; Scott Wangsgard; Jeff Richards
Subject: (EXTERNAL) North Point Small Area Plan Comments - Rudy Reclamation and Utah Waterfowl Association

Kristina,

I have reviewed the latest proposed small area plan and have the following additional comments on behalf of the Utah Waterfowl Association and Rudy Reclamation:

p. 24: Add "and other contrast mitigation building and landscape features" to the sentence addressing building color and materials. While colors that blend in with the natural surroundings are essential, there may be additional contrast mitigation techniques that are necessary and appropriate in specific areas such as the land close to 3200 West.

p. 32: Please add "and near 3200 West wetland habitats" to the sentence referring to wetlands near the Jordan River as high priority. The wetlands adjacent to 3200 West are highly productive and ecologically sensitive and deserving of heightened attention in relation to the acquisition of buffers.

p. 35: Spatial separation is critical to the success of a buffer. The distances in the plan are minimal and any further reduction in size will render them meaningless. While some buffering may consist of noise reduction and water management, increased distance mitigates the effects of proximity of activity, noise, and lighting. Please let me know if you have any questions.

Jack Ray
[REDACTED]

From: Carson Cronk [REDACTED]
Sent: Thursday, December 1, 2022 9:32 AM
To: Gilmore, Kristina
Subject: Re: (EXTERNAL) Small Area Plan - Tabled Discussion Updates

Krissy,

On behalf of the families I represent in the NorthPoint Small Area, I was asked to reach out to you to quickly go over a few concerns with traffic mitigation.

We are concerned about the traffic increases for this area, and there is an idea being thrown around about limiting the uses of distributing. As a real estate professional, I wanted to share with you I have observed in the market for these use types.

From what I have seen, distributing uses (although kind of a scary name) generally only have one to three trucks per tenant that distribute hard goods from their location. The only time we see a large number of trucks coming and going is from Amazon Warehouses, Walmart Warehouses, or FedEx Locations - all of which already have a facility within roughly a mile of the NorthPoint Small Area. Additionally, Office/Manufacturing specific uses only account for about 15% of the industrial market, and they actually have about 4x as many employees (and therefore vehicles) as distributing uses. I would highly recommend not limiting the uses of this area specifically to Manufacturing/Office if the intent is to mitigate traffic. Limiting uses would heavily increase vehicle traffic and does not allow 85% of the industrial market to operate in this area. Please ask around and let me know if I am misinformed but that is just my observation.

Again, thank you for all your work here. You have been very helpful. Please let me know if there is anything I can do for you.

Best,

LEGEND
PARTNERS ■■■■

Carson C. Cronk

2180 South 1300 East, Suite 240
Salt Lake City, UT 84106

[REDACTED]
www.legendllp.com

From: Megan O'Brien [REDACTED]
Sent: Thursday, December 1, 2022 10:20 AM
To: Gilmore, Kristina; Petro-Eschler, Victoria
Cc: Martinez, Diana; Norris, Nick; James Carolan; Will Channell
Subject: (EXTERNAL) NPSAP Support Letters
Attachments: Hamid Mirzakbarri - 2688 N 2200 W - 5 Acres.pdf; Hamid Mirzakbarri - 2704 N 2200 W - 5.45 Acres.pdf; Rebecca Auger - 2028 W 2670 N.pdf; Alma & Ozvaldo Mendoza - 3130 N 2240 W - 10 Acres.pdf; Annette Overson.pdf; Blaine Overson.pdf; Brad Auger - 2028 W 2670 N.pdf; Gary & Holly Banford - 2722 N 2200 W - 4.06 Acres.pdf

Categories: Due Date

Hello Krissy and Councilmember Petro-Eschler,

Attached are petitions of support for the NPSAP from residents that currently own agricultural zoned land in the Northpoint Small Area. These residents are in support of the AG land converting to M-1. These all are owners that are interested in maximizing the value of their land. They are concerned about the new language regarding updating the conditional and permitted uses in the M-1 and BP zoning code, because as more restrictions are placed on the permitted uses, the value of their land reduces accordingly.

My understanding is you should have received letters from Jim and Kathy Larkin as well as Eric Orme directly. Don Houchin's has stated he will be submitting his support petition directly today as well. Please let me know if you have not received them and we will make sure they get them over to you right away. We will have a few more support petitions before the hearing, but wanted to share what we've received to date asap.

Thanks,
Megan



OCC INDUSTRIAL

MEGAN O'BRIEN
Chief Executive Officer
[REDACTED]
PO Box 12437
Denver, CO 80212

Krissy Gilmore
Salt Lake City
Senior Planner
kristina.gilmore@slcgov.com

Victoria Petro Eschler
Salt Lake City
District #1 Councilmember
victoria.petro-eschler@slcgov.com

RE: SUPPORT FOR THE NORHPOINT SMALL AREA PLAN

As a Salt Lake City resident, I am writing to document my support for the Northpoint Small Area Plan, and I would highly recommend the Planning Commission approve the plan in its December 14th meeting and that City Council adopt this plan as currently scheduled in January 2023. The Northpoint Small Area Plan outlines several reasons to transition the land use from agricultural to industrial while allowing landowners to participate in the economic growth of the area.

The Northpoint Small Area Plan is just north of the Airport, and the loud noise and flightpaths make light industrial the most appropriate land use recommendation. Light industrial use would also minimize traffic and environmental impacts given the lower energy requirements of industrial when compared to higher environmentally impacting uses such as residential. Lastly, agricultural is NOT an appropriate use in this area given its high-water consumption and its proximity to the Great Salt Lake. By transitioning this area from a agriculture (high water consumption use) to industrial (a low water consumption use), more water will be able to flow to the Great Salt Lake which will result in a higher water level, less dust pollution, and better protection for the local brine shrimp and bird populations.

Additionally, there is significant demand for light industrial in a market where there is currently less than 2% vacancy in industrial space. The scarcity of supply is limiting growth and rapidly increasing rents for small business owners to a detriment. The transition from agricultural uses to light industrial uses would generate skilled jobs, alleviate the rental burden on small businesses, and provide a sensible long term growth plan that would minimize the environmental impact of future development in the area.

The Northpoint Small Area Plan would also allow for any current landowners to remain in their current zoning if they choose. Alternatively, other landowners would have the ability to participate in the economic development of the area. This freedom of choice is a win-win and is a sensible approach to this transitioning area.

The Northpoint Small Area Plan is well-balanced approach that will allow for a long-term transition to a higher and better use while also providing the current landowners more choices when it comes to the use of their land.

Thank you,

Jim and Kathy Larkin
2828 North 2200 West
Salt Lake City, UT 84116

NorthPoint Small Area Plan

Salt Lake City

PETITION IN SUPPORT OF THE NORTHPOINT SMALL AREA PLAN DATED OCTOBER 2022.

The undersigned supports the amended NorthPoint Small Area Plan as presented to the Salt Lake City Planning Commission on October 26, 2022 and request that the Planning Commission approve such plan on the meeting to be held on December 14, 2022. The undersigned attests that they are residents of Salt Lake City, have personally signed this petition on the date indicated, and reside or work at the stated address.

Signature:

K. J. Brown

Address:

2828 N. 2200 West Ste

Date:

11/22/22

NorthPoint Small Area Plan

Salt Lake City

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Signature:



Address:

2828 N 2200 West SLU

Date:

11/22/22

Krissy Gilmore
Salt Lake City
Senior Planner
kristina.gilmore@slcgov.com

Victoria Petro-Eschler
Salt Lake City
District #1 Councilmember
victoria.petro-eschler@slcgov.com

RE: SUPPORT FOR THE NORHPPOINT SMALL AREA PLAN

As a resident of the NorthPoint Small Area, I am writing to document my support for the Northpoint Small Area Plan as presented to the Salt Lake City Planning Commission on October 26, 2022. I would highly recommend the Planning Commission approve the plan with no additional limitations to distribution uses in its December 14th meeting and that City Council adopt this plan as currently scheduled in January 2023. The Northpoint Small Area Plan outlines several reasons to transition the land use from agricultural to industrial while allowing landowners to participate in the economic growth of the area.


Additionally, to ensure the greatest potential for economic growth in the area, we encourage the Planning Commission and/or City Council remove any limitations on the distribution uses allowed in the area. Not only would these limitations exclude the vast majority of small businesses seeking industrial space, but they would continue to drive rental rates higher for already struggling small businesses. Any limitation imposed on distribution uses would devalue the land, restrict economic growth, and increase rental rates for small businesses in the area.

Thank you,



Don Houchin
2042 West 2670 North
Salt Lake City, UT 84116

P.S. MY WIFE AND I OWN 3.3 ACRES OFF OF 2670 N THE HOUSE IS ON 1 ACRE THE OTHER 2.3 ACRES IS USELESS AND I PAY RESIDENTIAL TAXES ON OPEN GROUND THAT ZONING WON'T LET IT BE BUILT ON I LOSE ME 242.40 PER MONTH FOR THAT PROPERTY IN TAXES CAN DO ANYTHING WITH IT. THANK YOU



Krissy Gilmore
Salt Lake City
Senior Planner
kristina.gilmore@slcgov.com

Victoria Petro Eschler
Salt Lake City
District #1 Councilmember
victoria.petro-eschler@slcgov.com

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Thank you,

Signature: 

Address: 2240W 3130N SLC UT 84146

Date: 11/28/2022

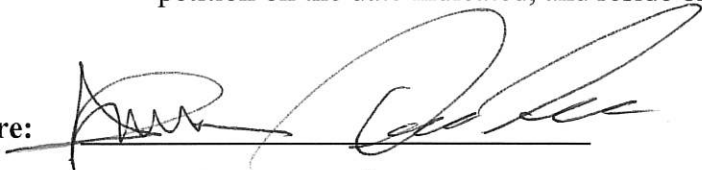
NorthPoint Small Area Plan

Salt Lake City

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Signature:

A handwritten signature in black ink, appearing to be "J. [unclear]", written over a horizontal line.

Address:

2240 W 3130 N SLC UT 84116

Date:

11/28/2022

NorthPoint Small Area Plan

Salt Lake City

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Signature: **Annette Overson**

Address: **PO BOX 184, Kanosh, Utah**

Date: **11/29/22**

NorthPoint Small Area Plan

Salt Lake City

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Signature: **Blaine Overson**

Address: **PO BOX 184, Kanosh, Utah 84637**

Date: **11/29/22**

Krissy Gilmore
Salt Lake City
Senior Planner
kristina.gilmore@slcgov.com

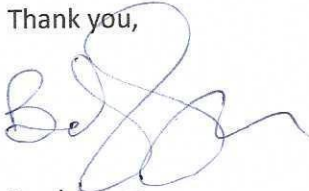
Victoria Petro-Eschler
Salt Lake City
District #1 Councilmember
victoria.petro-eschler@slcgov.com

RE: SUPPORT FOR THE NORHPPOINT SMALL AREA PLAN

As a property owner in the NorthPoint Small Area, I am writing to document my support for the Northpoint Small Area Plan as presented to the Salt Lake City Planning Commission on October 26, 2022. I would highly recommend the Planning Commission approve the plan with no additional limitations to distribution uses in its December 14th meeting and that City Council adopt this plan as currently scheduled in January 2023. The Northpoint Small Area Plan outlines several reasons to transition the land use from agricultural to industrial while allowing landowners to participate in the economic growth of the area.

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Thank you,

A handwritten signature in blue ink, appearing to read 'Brad Auger', with a stylized, looping flourish extending to the right.

Brad Auger
2028 West 2670 South
Salt Lake City, UT 84116

Krissy Gilmore
Salt Lake City
Senior Planner
kristina.gilmore@slcgov.com

Victoria Petro-Eschler
Salt Lake City
District #1 Councilmember
victoria.petro-eschler@slcgov.com

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Thank you,

A handwritten signature in dark ink, appearing to read "Rebecca Auger". The signature is fluid and cursive, with the first name "Rebecca" being more prominent than the last name "Auger".

Rebecca Auger
2028 West 2670 South
Salt Lake City, UT 84116

Krissy Gilmore
Salt Lake City
Senior Planner
kristina.gilmore@slcgov.com

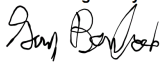

Victoria Petro Eschler
Salt Lake City
District #1 Councilmember
victoria.petro-eschler@slcgov.com

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Thank you,

<p>DocuSigned by:  55019BB9903C41D...</p>	<p>DocuSigned by:  A7624F3D78154B2...</p>
<p>Signature: _____</p>	
<p>Address: <u>2722 N 2200 W Salt Lake City, UT 84116</u></p>	
<p>Date: <u>11/29/2022</u></p>	

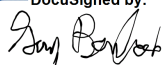
NorthPoint Small Area Plan

Salt Lake City

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Signature:

DocuSigned by:

55019BB9903C41D...

DocuSigned by:

A7624F3D78154B2...

Address:

2722 N 2200 W Salt Lake City, UT 84116

Date:

11/29/2022

Krissy Gilmore
Salt Lake City
Senior Planner
kristina.gilmore@slcgov.com


Victoria Petro Eschler
Salt Lake City
District #1 Councilmember
victoria.petro-eschler@slcgov.com

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Thank you,

Signature: 

Address: 2688 N. 2200 E. S.L.C. J. B. 11/6

Date: 11/28/22

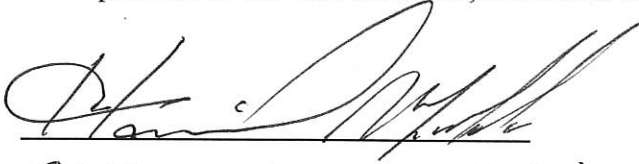
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Salt Lake City

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Signature:



Address:

2688 N. 2200 W. S.L.C. U. 84116

Date:

11/28/22

Krissy Gilmore
Salt Lake City
Senior Planner
kristina.gilmore@slcgov.com

Victoria Petro Eschler
Salt Lake City
District #1 Councilmember
victoria.petro-eschler@slcgov.com

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Thank you,

Signature: 

Address: 2704 N. 2200 W. S.L.C. W-84116

Date: 11/28/22

NorthPoint Small Area Plan

Salt Lake City

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Signature:



Address:

2704 N. 2200th S.L.C. W.B. 116

Date:

11/28/22

From: Jason Head <[REDACTED]>
Sent: Wednesday, November 30, 2022 5:05 PM
To: Gilmore, Kristina
Cc: Norris, Nick; Brian Dilley; Will Clark; Dave Tolman
Subject: (EXTERNAL) Northpoint Small Area Plan Amendment
Attachments: Small Area Plan Comment Letter_30Nov2022.pdf

Krissy,

Please find attached a letter from Frontier Corporation that addresses concerns with respect to wetland boundaries and buffers within the Small Area Plan amendment.

Also, I think you understand by now our objections and concerns with the plan, especially with respect to the restrictions on maximum building length along 2200 West and restrictions on distribution uses. For the record for the Planning Commission package, I want to express that if the City zones this area with restrictions on distribution uses and building frontages, the City will zone out industrial development and the land will sit vacant for a long time. It is not financially viable for developers to invest hundreds of millions of dollars into an industrial park with limits on distribution uses. The reason is that manufacturers occupy only about 15% of all industrial space in the Salt Lake market, and they are not homogenous in how they make site selection decisions. There is nothing so unique about the Northpoint area in the eyes of manufacturers that would cause a disproportionately large number of manufacturers to cluster in the area. It is not a function of distribution users crowding out manufacturing users or facilities not being built to specifications that manufacturers require. Manufacturers make site selection decisions based on many factors including proximity to suppliers, customers, cross-state and international trade channels, employees, as well as based on facility functionality and real estate costs. An industrial park would appeal to all industrial users including manufacturers, start-up incubators, distributors, and warehouse users. Tenants within the park would represent a cross section of different user-types in proportion to their representation within the market as a whole.

If the City wants to promote more manufacturing in the Northpoint area, the City can offer incentives directly to manufacturing users without regulating out other users. This would make Northpoint a viable place for developers to build and more competitive compared to other locations within and without the City where new industrial facilities can more easily be built.

Regards,

Jason Head
Mitre Peak Company, LLC
Salt Lake City, Utah
[REDACTED]

www.mitrepeakcompany.com



November 30, 2022

Mr. Brian Dilley
Dakota Pacific Real Estate
299 South Main Street, Suite 2450
Salt Lake City, Utah 84111

Subject: NorthPoint Small Area Plan, Salt Lake City, Utah
Environmental Comments for Draft Plan dated October 2022

Dear Mr. Dilley:

Per your request, Frontier Corporation USA (Frontier) completed a review of the October 2022 draft of the NorthPoint Small Area Plan prepared by Logan Simpson. The main purpose of the plan is to identify future land use and development characteristics for the Plan Area. Included are recommendations for identifying appropriate buffering, building design and development characteristics to reduce impacts to important wildlife habitat.

Important wildlife habitat is inferred in the Plan as being “critical habitat areas”, including both wetland and upland habitats. “Sensitive lands” are referred as another type of important resource that needs consideration for protection. The Plan suggests that all designated wetlands, uplands, and sensitive lands should fall under a Natural Open Space District. Graphic 2.2 in the Plan shows designated wetland areas and natural open space areas.

The Plan emphasizes incorporating critical habitat areas and sensitive lands into planning the future land use categories, and presumably the zoning restrictions that would be associated with each land use category. However, the Plan does not identify the specific site characteristics, criteria or rationale that were used to identify what constitutes a critical habitat area, or sensitive land area or a designated wetland area. It appears that these restrictive designations were made on broad (and probably erroneous assumptions) without any site specific information.

It appears the Plan lumped all designated wetlands as being critical habitats, but does not identify how the wetlands were designated. It appears that the wetland mapping on Graphic 2.2 is based on National Wetlands Inventory (NWI) data. Only the U.S. Army Corps of Engineers (USACE) has the regulatory authority to designate what wetlands, ponds, playas or other types of aquatic resources are protected under the federal Clean Water Act. The State of Utah does not regulate wetlands, and neither Salt Lake County nor Salt Lake City have specific ordinances or procedures for identifying the presence and locations of wetlands. Historically, these agencies have referred to the USACE’s official designation of wetlands for their site specific land use and development decisions.

Frontier Corporation USA
221 N. Gateway Drive, Suite B
Providence, UT 84332
(435) 753-9502

The NWI is not a USACE work product, and cannot be relied on as an official designation of delineated wetlands that fall under the USACE's permitting authority. In fact, it is well known that NWI mapping is outdated not very accurate because it was prepared using the interpolation of aerial imagery and remote sensing techniques. A common error with the NWI mapping is the misidentification of irrigated fields as being wetlands because they can have a "wet" signature.

In fact, many of the wetland areas shown on Graphic 2.2 are affected by irrigation. The Plan Area is situated within a dry semi-arid landscape that requires irrigation for agricultural production. Hence the need for the Reclamation Ditch, which is a raised, above-grade man-made irrigation canal. The Reclamation Ditch delivers water diverted from the Jordan River south of Salt Lake City and is the main source of irrigation water for the Plan Area. The West Branch of the City Drain is another man-made conveyance that crosses the Plan Area. There would be no appreciable sources of water in the Plan Area but for these man-made conveyances.

Many of the potential wetlands shown on the NWI are either directly or indirectly affected by water from these man-made conveyances. For example, the Reclamation Ditch delivers irrigation water to the Rudy Drain (which is incorrectly labeled as the Rudy Canal on Graphic 2.2). In turn, the Rudy Drain delivers water to duck clubs that manage artificially diked wetlands located west of the Plan Area. Without water from the Reclamation Ditch, there would likely be no wetlands, or significantly fewer wetlands, associated with the Rudy Drain within the Plan Area. There is a reason why the Reclamation Ditch was built to service the properties in the Plan Area, and that is because there is a lack of water in the Plan Area. Once irrigation water is removed from the landscape, it is questionable what wetlands would remain.

Another problem with the NWI mapping is the assumption that dry sparsely vegetated saline playas meet the USACE's wetlands designation criteria, because many do not. The playa-like areas south and north of 3200 North would not likely be designated as wetlands by the USACE. But the land use for this area shown on Graphic 2.2 is shown as Natural Open Space.

Thus, the NWI should only be used as a tool for identifying the potential presence of wetlands. A site-specific investigation following the USACE's delineation procedures would be required for any official wetland designations. Using the NWI mapping to impose land use restrictions based on assumptions of what would be designated as wetlands is bad policy if the assumption is that these "wetlands" would be "real" and "permanent" features in the landscape when land uses transition from irrigated agriculture to residential and commercial development. This is especially important considering the Plan calls for setback buffers ranging from 200 to 75 feet on designated wetlands.

In summary, it would seem that the assignment of any Natural Open Space or set back buffers from wetlands that would be restricted from future development should be based on actual wetland boundaries that have been designated by the USACE, and an assessment whether the protected wetland would be a permanent landscape feature.

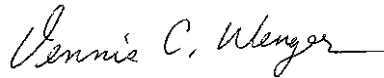
Mr. Brian Dilley
Dakota Pacific Real Estate
November 30, 2022
Page 3 of 3

Additionally, the amount and type of setback buffer should be determined based on the actual habitat functions that the buffer is intended to preserve. This would require site specific habitat functional assessments to determine appropriate buffer types and buffer widths. There is no site-specific rationale explained in the Plan for determining setback buffers.

Please feel free to contact me if you have any questions about our review comments for the draft NorthPoint Small Area Plan.

Sincerely,

Frontier Corporation USA

A handwritten signature in black ink, reading "Dennis C. Wenger", followed by a horizontal line.

Dennis C. Wenger
Senior Wetlands Ecologist
Principal

From: Eric Orme <[REDACTED]>
Sent: Monday, November 28, 2022 5:25 PM
To: Gilmore, Kristina
Subject: (EXTERNAL) Re: Northpoint Small Area Plan - Updated Draft

Hi Krissy,

Thank you again for meeting with me to discuss some of the details and modifications that have been made in this updated draft plan. I have really admired your demeanor and temperament that you have maintained through this process. I appreciate your willingness to listen and understand. As my part of the steering committee, I do have a few comments on the new edits below:

- Page 16: Added language to the Vision Map to better define wetland areas. ***The footnote really helps to better define the wetland area and what is expected from the property owner and SLC with future development.***
- Page 18: Revised the language on page 18 (the setbacks and buffer table) to clarify the intent of those setbacks and buffers. ***What is the purpose of restricting the maximum continuous frontage along 2200 W? The areas of most contention are those that surround the fully entitled properties in this area, those that face the Scannel development. The property owners on the northern part along 2200 W are generally supportive of Industrial, including Warehouse/Distribution uses, and are currently even seeking annexation and M-1 zoning.***
Those of us who border part of the wetland area, we appreciate the flexibility that was added. However, as we previously have discussed, the wetland buffers won't be able to achieve their intended goals and will ultimately only result in a regulatory taking of property of five smaller property owners, as stated on page 19 of the plan. I understand the unfortunate timing of the Small Area Plan and the approval of the Scannell Development, but unfortunately, this action has already caused the goal wetland buffers is to set out to achieve, to fail. (More detail on this below)
- Page 32: Added language to the Evaluate the Feasibility of Acquiring Sensitive Lands action item to state that land adjacent to the Jordan River should be a high priority for preservation.
- Page 33: Added language to support a Northpoint specific development code as the preferred implementation path. New language includes:
 - A modified list of permitted and conditional uses to promote manufacturing and office uses while limiting distribution-focused uses. ***This is a new, very significant edit. All M-1 permitted and conditional uses should apply to this zone as well. It is hard to imagine any demand for office space this distant from a city center, retail, and restaurants. The vast majority of businesses seeking light industrial space will need distribution/warehousing. It is difficult to see Salt Lake City's vision for this area, it is constantly changing and becoming more and more restrictive.***
 - Incentive-based tools for preserving open and sensitive lands, such as allowing an increase in the maximum building façade length if preserving a larger amount of open space or buffer area than required. ***Implementing a restrictive building facade length in order to use as a bargaining chip for additional open space from the already excessive buffers is simply an abuse of power and a regulatory taking of property.***
- Page 36: Revised the wetland buffer action item to better guide staff in updating the zoning code. Language includes the potential for reducing buffer areas depending on the function of the wetland, and flexibility in buffer widths if mitigation measures occur. ***Page 35 - If applied as an update to the City's existing Riparian Overlay Zone, will these wetland buffers apply to other wetland areas citywide or will it just be targeted to this small area plan (even more specifically, targeted to us 5 smaller property owners in the area plan). How will "priority wetlands" and "highest priority wetlands" be identified or defined? More specifically, what areas in this area plan are identified as "highest priority wetlands" and "priority wetlands"? What are the***

characteristics of each? Who will be making the determination of whether the buffer on a specific property "is appropriate based on the condition, function, and goal of the specific wetland buffer"? Is there someone qualified in the City to make such a determination? Based upon the goals of the wetland buffer described in the small area plan, these goals will never be achieved. ~93% of the land surrounding the wetland areas are already fully entitled and will be fully developed in the next few years by the Scannell development. With the additional restrictions being imposed on future development in this area plan, it is VERY unlikely the 430+ acres of the Scannell Development, will reseek to rezone. Within the area plan, the linear feet of the land surrounding the two "Designated Wetland" areas is roughly 19,000 linear feet, the small area plan only sets out to achieve wetland buffers on approximately 1,350 linear feet of the total 19,000 linear feet surrounding the wetland areas, due to the remaining ~17,650 feet bordering already fully entitled land that is being developed by the Scannell Development with no restrictions on these wetland buffers. These buffers are being unfairly imposed on us 5 smaller property owners and are not set out to achieve their goal.

- There were other changes for grammar and clarity throughout, but the intent of the language did not change.

On Wed, Nov 16, 2022 at 4:50 PM Gilmore, Kristina <Kristina.Gilmore@slcgov.com> wrote:

Good Afternoon Steering Committee and stakeholders,

We have updated the draft Northpoint Small Area Plan in response to direction received from the Planning Commission at their October 26th meeting. A more detailed staff report will be published on these changes, but I wanted to get this draft in your hands as soon as possible. Key changes include:

- Page 16: Added language to the Vision Map to better define wetland areas.
- Page 18: Revised the language on page 18 (the setbacks and buffer table) to clarify the intent of those setbacks and buffers.
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 - Incentive-based tools for preserving open and sensitive lands, such as allowing an increase in the maximum building façade length if preserving a larger amount of open space or buffer area than required.
- Page 36: Revised the wetland buffer action item to better guide staff in updating the zoning code. Language includes the potential for reducing buffer areas depending on the function of the wetland, and flexibility in buffer widths if mitigation measures occur.
- There were other changes for grammar and clarity throughout, but the intent of the language did not change.

We still plan on bringing the plan back to the Planning Commission at their **December 14th** meeting. If possible, please get me any comments by **November 30th** so that I can make sure those comments are included and considered in the staff report to the commission. However, as usual we will accept comments until the meeting date.

Thank you for your continued participation and please reach out with any questions or concerns.

Sincerely,

KRISSY GILMORE, AICP

Senior Planner

Planning Division

DEPARTMENT *of* COMMUNITY *and* NEIGHBORHOODS

SALT LAKE CITY CORPORATION

TEL 801-535-7780

From: [Westpointe 2](#)
To: [Gilmore, Kristina](#)
Cc: [Chris Souther](#); [Denise Payne](#); [Patti Jensen](#); [Terry Marasco](#)
Subject: (EXTERNAL) FW: Northpoint Small Area Plan - Updated Draft
Date: Friday, November 18, 2022 10:13:35 AM

PS to the prior email which was written early this morning after being out of town for several days: Thank you for the heads up on the changes. It is appreciated. Have now compared the revised pages to the original. Particularly pleased to see the addition of a North Point development code. Will need to consult with others about how best to utilize this new tool.

- Not sure I understand the page 18 change—how does changing “must” to “should” clarify the intent as you indicated in your email explanation?
- The notation to the Vision map is useful but is hidden within the report-- hard to find and read. Other option could include adding the information to the explanations of “land use categories—natural open space” on page 15. Another option would be to add it to the Wetland Design standards on page 28. It should also be referenced on page 35 when discussing the recommendations regarding wetland buffer zones.
- Consider adding excerpts from the Riparian Corridor and Lowland Conservancy Overlay zones to the appendix. This would strengthen the recommendations on page 33 to amend these policy documents and would be consistent with how the report treats similar proposed planning amendments such as the Master Street plan.

From: dpappasowen@gmail.com <[REDACTED]>
Sent: Friday, November 18, 2022 12:31 AM
To: 'Gilmore, Kristina' <Kristina.Gilmore@slcgov.com>
Cc: Norris, Nick <Nick.Norris@slcgov.com>; Lynn Skidmore <[REDACTED]>; Dan Thompson <[REDACTED]>
Subject: RE: Northpoint Small Area Plan - Updated Draft

Who received your email with the Nov. 2022 “adoption draft” attachment as well as your explanation (below) of changes? It appears the Nov 16th email was sent to the 15-member steering committee members only. There is only one 2200 West resident on that steering committee. How are the other impacted residents being contacted about these changes? Is the City assuming the community council is able to keep community members informed of the frequently evolving changes as well as collect feedback on these changes as well as the proposed unincorporated County annexation proposal and the Salt Lake City rezoning proposal? All of these proposals are being submitted at the same time with different staff people involved and even different levels of city and county governments. As a result, people are struggling to determine how to best to respond especially since some of the most critical concerns have not been addressed.

Will a December 2022 “adoption draft” be prepared after the Nov. 30th master plan submission deadline and forwarded to the Planning Commission? If not, what is the purpose of these comments/recommendations and how will they be incorporated into the plan? It was our understanding that the Planning Commission expected to receive a more agreeable master plan

proposal at any upcoming meeting. We may not be able to agree on everything but certainly any remaining disagreement needs to be clearly delineated and the rationale for the differences clear to those reviewing the proposal. At this point, I am concerned that we are not on track for such a deliverable.

From: Gilmore, Kristina <Kristina.Gilmore@slcgov.com>

Sent: Wednesday, November 16, 2022 4:50 PM

Subject: Northpoint Small Area Plan - Updated Draft

Good Afternoon Steering Committee and stakeholders,

We have updated the draft Northpoint Small Area Plan in response to direction received from the Planning Commission at their October 26th meeting. A more detailed staff report will be published on these changes, but I wanted to get this draft in your hands as soon as possible. Key changes include:

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Thank you for your continued participation and please reach out with any questions or concerns.

Sincerely,

KRISSY GILMORE, AICP
Senior Planner

Planning Division

DEPARTMENT *of* COMMUNITY *and* NEIGHBORHOODS
SALT LAKE CITY CORPORATION

TEL 801-535-7780

From: [Alma Mendoza](#)
To: [Gilmore, Kristina](#)
Subject: (EXTERNAL) 200FT Buffer Preserving Wetlands
Date: Wednesday, November 16, 2022 9:02:34 AM

Dear Kristina,

Regarding Parcel #1: 2249 W 3130 N
08-09-251-011-0000

Regarding Parcel #2. 2240 W 3130 N
08-09-251-016-0000

Why is Salt Lake City imposing such a strict and large wetland buffer on my property and my neighbors' properties? Eighty Five percent of the area that surrounds this "Wetland" is ALREADY approved by the Swaner Development and ISN'T subject to ANY buffers.

Yet this plan is imposing these large buffers on the remaining 15% of the surrounding area saying that Salt Lake City is going to steal 30-50% of our land and deem it unusable even though wetlands don't even exist on our property?

I would please ask the city to reconsider this matter and withdraw any imposing buffers on my parcel and the other four neighboring parcels affected.

Thank you,
Alma Mendoza
Resident

[Sent from Yahoo Mail for iPhone](#)

From: [Kayla Mauldin](#)
To: [Gilmore, Kristina](#)
Subject: (EXTERNAL) Northpoint Small Area Plan
Date: Thursday, November 17, 2022 11:41:42 AM
Attachments: [image001.png](#)

Hi Krissy,

Happy Thursday! My name is Kayla Mauldin, and I am the Senior Long Range Planner at the Greater Salt Lake Municipal Services District. Helen Peters (SLCo) has kept me up-to-date on the Northpoint Small Area Plan, since I am the long range planner assigned to Unincorporated Salt Lake County. My colleagues and I gave feedback to Olivia a couple months ago.

I've reviewed the latest draft of the plan and think it looks great overall. I appreciate the detailed recommendations and the emphasis on enhancing the natural design of the area. I actually think the northern shore of the Salt Lake is quite beautiful. My only feedback would be on the future land use map. I would like to see natural open space conserved along the Rudy Canal (even just as a small riparian corridor). I only learned about this project recently, so I'm sure I missed conversations around this – but if the canal is anticipated to stay, it would be nice to get some ecological benefit from it. Additionally, the areas identified as power easements could be simultaneously preserved for open space. In a few of our other communities, we are thinking about the possibility of trails or open space along transmission corridors, etc.

Thanks for your work on this project! Please keep me posted on its progress. All my best ~

Kayla

Kayla Mauldin
Senior Long Range Planner
Greater Salt Lake Municipal Services District
KMauldin@msd.utah.gov
(385)468-6699 office

MSD_Logo



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From: [Terry Marasco](#)
To: [Gilmore, Kristina](#)
Cc: [Norris, Nick](#)
Subject: (EXTERNAL) Comments for No Point Small Area Plan
Date: Wednesday, November 9, 2022 6:57:21 PM

1. Reduction of home ownership in the city. Industrial buildout around existing homes decreases their value
2. Finalizing the Plan before any zoning changes are made
3. Any further build-out of warehouses cannot be justified given the already overbuilt warehouses and those planned. Ben Hart, the CEO of the Inland Port believes this is the case in an exchange with Terry
4. Certain commercial/industrial buildouts will likely contribute to reduced air quality in the area and the valley in general if diesel trucks are increased in the area.
5. The annexation initiative is illegal
6. The transition area is unacceptable and needs to remain as open space.
7. The Plan does not include a discussion of the impacts on the West Side regarding air quality, water quality and supply, and mosquito issues of additional development. Note the prison is having issues with mosquito abatement at this time. <https://corrections.utah.gov/2022/10/24/whats-going-on-with-mosquitoes/> and <https://www.fox13now.com/news/fox-13-investigates/workers-worry-utahs-new-billion-dollar-prison-isnt-safe>

Terry Marasco
Salt Lake City, Utah

"Objects in the mirror are closer than they appear"