



Staff Report

PLANNING DIVISION
COMMUNITY & NEIGHORHOOD DEVELOPMENT

To: Salt Lake City Planning Commission

From: Amanda Roman, Urban Designer

801-535-7660 or Amanda.Roman@slcgov.com

Date: March 22, 2023

Re: PLNPCM2022-01109: 754 South State Street Zoning Map & Text Amendment

Zoning Map Amendment

PROPERTY INFORMATION:

Address	Parcel ID	Approximate Acreage
748 South State St.	16-07-103-017	.55
709 South Main St.	16-07-103-001	.66
36 E 700 S	16-07-103-002	.81
48 E 700 S	16-07-103-003	.17
56 E 700 S	16-07-103-004	.24
728 S Major St.	16-07-103-008	.10
725 S Major St.	16-07-103-009	.25
735 S Major St.	16-07-103-010	.10
739 S Major St.	16-07-103-011	.10
754 S State St.	16-07-103-022	5.97
Major Street	None	Total Acreage: 8.95

MASTER PLAN: [Downtown Master Plan](#)

ZONING DISTRICT: *Current* – [D-2 Downtown Support District](#)

Proposed – [D-1 Central Business District](#)

REQUEST:

Kirton McConkie, represented by Tyler Buswell, Attorney for IHC Health Services, Inc. (the Property Owner), initiated a petition for a zoning map and zoning text amendment, which would facilitate the development of an urban hospital at approximately 754 S State Street.

The zoning map amendment request is to rezone 10 parcels from D-2 Downtown Support District to D-1 Central Business District. If the zoning map amendment is adopted, the D-1 zone would not support the applicant's development proposal, as the D-1 zone does not currently allow hospitals as a permitted or conditional use.

To address this, the proposed text amendment to [section 21A.33.050 Table of Permitted and Conditional Uses for Downtown Districts](#) would add the following uses as Permitted within the D-1 zoning district:

- Ambulance service (indoor)
- Ambulance service (outdoor)
- Hospital, including accessory lodging facility

The definitions of the proposed uses are provided below for reference.

AMBULANCE SERVICE: An emergency response facility housing ambulance services, dispatching, staging, and maintenance.

HOSPITAL, INCLUDING ACCESSORY LODGING FACILITY: An institution licensed by the State of Utah specializing in giving clinical, temporary, or emergency services of a medical or surgical nature to human patients.

RECOMMENDATION:

Based on the analysis and findings of fact in this staff report, Planning staff finds that the zoning map amendment meets the standards, objectives, and policy considerations of the city for a zoning map amendment and recommends that the Planning Commission forward a positive recommendation to the City Council.

Staff also finds that hospitals, including accessory lodging facilities and ambulance services are appropriate Permitted uses within the D-1 Central Business District and recommends that the Planning Commission forward a positive recommendation to the City Council to amend section 21A.33.050 Table of Permitted and Conditional Uses for Downtown Districts.

ATTACHMENTS:

[ATTACHMENT A: Vicinity & Zoning Maps](#)

[ATTACHMENT B: Applicant Materials](#)

[ATTACHMENT C: Property & Vicinity Photographs](#)

[ATTACHMENT D: Analysis of Standards – Standards for General Amendments](#)

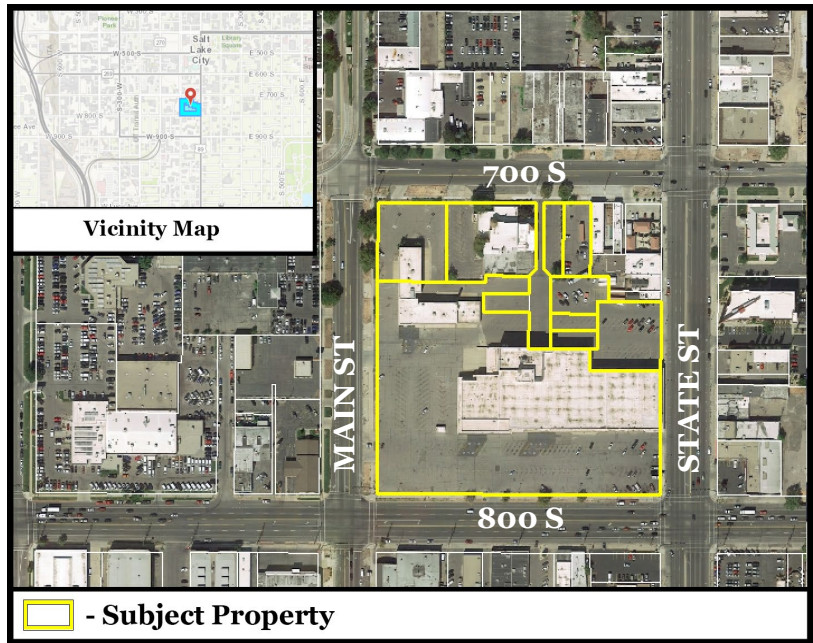
[ATTACHMENT E: Public Process & Comments](#)

[ATTACHMENT F: Department Review Comments](#)

Petition Description

The proposal includes a zoning map amendment to change the zoning of 10 parcels at approximately 754 S State Street from D-2 Downtown Support District to D-1 Central Business District. The purpose of the proposed amendment is to allow for the redevelopment of the property with an urban hospital. To develop the property, the D-1 zoning district land use table also needs to be amended to add hospitals and ambulance services as permitted uses.

The project site is approximately 9 acres, which is significantly smaller than a typical hospital development. While an official development proposal has not been submitted to the City, the applicant has indicated that rezoning the property would allow them to build up instead of out, thus making this site a feasible location for their proposal. The property has long been home to the Sears Building, which has sat vacant since the doors were closed in 2018, after being open since 1947. The building has subsequently been demolished.



The intent behind the rezone and text amendment request is to allow for more design flexibility. The building height in the D-2 zoning district is limited to a maximum of 120 feet, with Design Review approval. The by-right building height in the D-1 zone for buildings located on a block corner is 100 – 375 feet. Buildings taller than 375 feet must receive Design Review approval, but there is no maximum height. If an urban hospital is built, it would be the southern anchor of downtown Salt Lake City.

Under the current zoning ordinance, hospitals are a Permitted use in three zoning districts and Conditional in one. Ambulance services are permitted in multiple districts, but most zones have size limitations associated with their use. The table below includes all the zones where hospitals and ambulance services are allowed. The asterisks indicate zones where the use must be reviewed as a Conditional Use to allow more than three ambulances at one location.

	Hospitals, (Including accessory lodging facility)	Ambulance Services
I (Institutional)	P	
UI (Urban Institutional)	P	
TSA	P	
RP (Research Park)	C	P*
BP (Business Park)		P*
CS (Community Shopping District)		P*
CC (Corridor Commercial)		P*
CSHBD (Sugar House Business District)		P*
CG (General Commercial)		P
M-1 and M-2 (Manufacturing)		P
G-MU (Gateway Mixed-Use)		C

If the proposed uses are permitted in the D-1 zone, they could potentially impact the blocks highlighted in the map below. The subject property (outlined in red) is a half block away from the rest of the D-1 zoning district, but it is anticipated that surrounding property owners will also apply for zoning map amendments if the City supports the current proposal.

Adding the proposed permitted uses to the D-1 zoning district would increase the development potential of all D-1 properties. These uses within a hospital could support businesses meant for just employees and those that will cater to the surrounding community. Hospitals and ambulance services are very site specific developments, and it is not expected that there will be similar development proposals in downtown.



Applicable Review Processes and Standards

Review Processes: Zoning Map & Text Amendment

Zoning map and text amendment proposals are reviewed against a set of considerations from the [Zoning Code](#). The considerations are listed in [Attachment D](#).

Planning staff is required by ordinance to analyze proposed zoning map amendments against existing adopted City policies and other related adopted City regulations, as well as consider how a zoning map amendment will affect adjacent properties.

Planning staff is required by ordinance to analyze zoning text amendments against existing adopted City policies and other related adopted City regulations, as well as consider how a zoning text amendment is consistent with applicable overlay districts that impose additional standards and the extent to which the amendment implements best current, professional practices of urban planning and design.

However, ultimately, a decision to amend the zoning map or the zoning text is up to the discretion of the City Council. The City Council may adopt, adopt with modifications, or deny the proposals.

KEY CONSIDERATIONS:

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

1. [Neighborhood and Citywide Master Plan Considerations](#)
2. [Development Potential](#)
3. [Compatibility with Adjacent Properties](#)

Consideration 1: Neighborhood and Citywide Master Plan Considerations

Downtown Master Plan

The downtown area is designated as North Temple to 900 South and I-15 to 200 East. The subject property is located at the edge of downtown within the South State corridor and adjacent to the Central 9th neighborhood, in an area also referred to as Midtown. The plan recognizes that this neighborhood is becoming more urbanized and is perceived as the backbone of Salt Lake County, where growth is expected and appropriate.

The Downtown Master Plan recognizes the population growth that is occurring along the Wasatch Front, and in turn, Salt Lake City. The downtown area is an important economic and cultural center that needs to provide better access to services and amenities that support existing and new downtown residents. The proposed hospital, which would be the result of an approved zoning map and text amendment, would provide health services and job and business opportunities to both local and regional residents.

Higher impact development is expected in this area and new developments should use existing infrastructure and be designed as to not disrupt the Central City residential neighborhoods to the east, which provide unique and historic housing choices close to downtown. If a hospital is built, the existing infrastructure will need to be improved, as the current systems cannot handle such an increase in demand. The developer will be required to provide offsite water, sewer, and stormwater quality improvements. The increased demand will require the replacement of water mains in State Street, 500 South, Main Street, and 700 South. Other improvements will be required as determined through the building permit review process.

Redevelopment of the site should reflect the historic scale and orientation of buildings in the neighborhood, with pedestrian scaled design where buildings are situated close to the sidewalk and have activated ground floors that provide a variety of local restaurant and retail options that the Midtown Business District has become known for. If a hospital is built, the design would be required to respect the existing community character while pushing the boundaries of what downtown Salt Lake City is envisioned to become. Public and city reviewer comments call for street activation, breaking up the block, and high quality design, specifically of the public realm.

The proposed rezone would allow for denser development and taller buildings than what the Downtown Master Plan envisions for the South State neighborhood, but the zoning designation supports the initiatives as outlined in the plan and would be a continuation of the downtown development framework that has been established. The subject property is less than one block away from the edge of the D-1 zoning district that forms the Central Business District. Although the subject property would be surrounded by the D-2 zoning district, it is anticipated that surrounding property owners will also eventually apply to rezone their properties.

Plan Salt Lake Elements and Considerations

Plan Salt Lake (2015) outlines an overall vision of sustainable growth and development in the city. This includes the development of a diverse mix of uses which is essential to accommodate responsible growth. At the same time, compatibility and how new development fits into the scale and character of existing neighborhoods is an important consideration. New development should be sensitive to the context of surrounding development while also providing

opportunities for new growth. The proposed rezone and text amendments are aligned with the general principles and strategies identified in Plan Salt Lake.

Guiding Principles outlined in Plan Salt Lake that would relate to the proposed change include the following:

- 1) *Neighborhoods that provide a safe environment, opportunities for social interaction, and services needed for the wellbeing of the community therein.*

Inherently, hospitals are safe spaces where people can go to receive care in multiple capacities. Permitting hospitals and their associated uses in the D-1 zoning district expands the potential service area and makes it easier for Salt Lake City residents to receive medical care. If designed with active ground floor uses that cater to both employees and residents, the proposed hospital could also become a place for social interaction in addition to providing medical services. As the population continues to grow, so does the need for safe active spaces.

- 8) *A beautiful city that is people focused.*

The beautiful city principle speaks to designing the built environment so that it enhances our quality of life by creating people-focused development. To do this, developments must respond to the surrounding context, reinforce and preserve neighborhood character, create opportunities to connect with nature in urban settings, and support active transportation. If the rezone and text amendment are approved, the property owner can redevelop the property as proposed or could change course and redevelop with any of the allowable land uses in the D-1 zoning district.

The community and city staff want to ensure any future development is appropriate and creates a product which enhances the neighborhood and is an extension of the already established Central Business District. While a development proposal has not been submitted, the applicant and IHC representatives have been clear that their intent is to develop the property thoughtfully and meet the goals as outlined in the master plan and by the citizens who have been involved in the public engagement process.

- 11) *Ensure access to all City amenities for all citizens while treating everyone equitably with fairness, justice and respect.*

Permitting hospitals and their accessory uses in the D-1 zoning district expands the number of properties where a hospital could be potentially built. As the population continues to grow, there is an increasing demand for health services and amenities. Expanding medical access to the downtown population is equitable and provides a service that could not otherwise be offered to residents. The subject property is also located nearby the women's resource center on 700 South. A hospital would help provide much needed services to the unhoused community that lives within this neighborhood.

12) A balanced economy that produces quality jobs and fosters an environment for commerce, local business, and industry to thrive.

The proposed rezone and text amendment would increase the development potential of the property and support the creation of high quality jobs within Downtown. The proposed hospital would include restaurant and retail options that cater to both the employees of the hospital and the surrounding neighborhood. The hospital has the support of neighboring property owners, under the condition its programming encompasses both internal and external users.

Consideration 2: Development Potential

The main development potential difference is that the map amendment would allow for additional building height that wouldn't be possible under the D-2 zoning district. The by-right height in the D-2 zoning district is 65 feet, with a maximum building height of 120 feet, upon receiving Design Review approval. The by-right height for corner block buildings in the D-1 zone is a minimum of 100 feet and a maximum of 375 feet. There is no maximum height if Design Review approval is granted. Other differences in the two zones are the Design Standards ([chapter 21A.37](#)) that are required when building in the D-2 zone. The zone has standards relating to ground floor use and visual interest, building materials and glass requirements, building entrance locations, and maximum building length. The D-1 zoning district does not impose design standards other than requiring ground floor glass. Design standards are intended to promote walkability by utilizing planning and urban design principles. If the subject property is rezoned to D-1, the City Council should consider what the lack of design standards could result in if the property is redeveloped under the current zoning ordinance.

To address increasing development pressures, the Planning Division has transmitted a proposed ordinance to the City Council that would increase allowable building heights while supporting human-scale development, increased street activation, pedestrian accessibility, and community character. If adopted, the Downtown Building Heights and Street Activation text amendment (PLNPCM2022-00529) would directly affect the development potential of the subject property.

The proposed amendment would eliminate the distinction of corner and midblock lots and change the by-right building height in the D-1 zone to 200 feet. Buildings over 200 feet would be required to receive Design Review approval but would have no maximum height. To qualify for the additional height, the proposal would be required to include one of the following: inclusion of a midblock walkway or affordable housing incentives, additional ground floor use and visual interest, a restrictive covenant for a building older than 50 years and not listed as a local landmark site, or 500 square feet of open space that is privately owned but publicly accessible. The D-1 zoning district would also have new design standards that are not currently required such as, maximum blank wall and reflective glass limitations, dimensions between building entrances, streetscape requirements, and increased building articulation. Additionally, to support pedestrian-scaled design, the maximum building setback would be 8 feet. If a setback was proposed, the yard area would be required to have a pedestrian element such as seating, awnings, or landscaping.

Although the ordinance has not been adopted, Staff believes its potential impacts should be considered, as it has been transmitted to the City Council and may be adopted prior to the

subject property being rezoned. The property owner could develop by-right up to 200 feet, but because of the site constraints, Planning staff anticipates that a Design Review application will be submitted to request additional building height. If adopted prior to the property being developed, the proposed ordinance would help ensure that the future building has active ground floor uses, is pedestrian-oriented along the major street frontages, and incorporates one of the five elements listed above that would be required for additional building height.

Consideration 3: Compatibility with Adjacent Properties

As part of a zoning amendment request, staff is directed to analyze how adjacent properties may be affected by a change in zoning to the property. The subject property is unique in that it is where the boundaries of multiple Community Councils meet. The site is within the Ballpark Community Council boundary, but also within 600 feet of the Central 9th, Central City, and Downtown Community Council boundaries. The site is truly the epicenter of where the interests and needs of these communities connect. The block is technically in the Ballpark neighborhood, but the recently adopted Ballpark Small Area Plan does not include the property in its vision. The subject property falls within the Downtown Master Plan, as discussed above, and is in the South State/Midtown neighborhood.

To the north of the property is the city's urban core, where all the D-1 properties are located. This area is expected to continue to expand to approximately 900 South, as described in the Downtown Master Plan. The proposed rezone is compatible with the development to the north and represents how the community envisions the expansion of downtown. The property itself is surrounded by commercial uses that are smaller scaled in nature. Businesses include restaurants, barber shops, banks, and multiple car dealerships.

The Central City residential neighborhood is to the east. The neighborhood, beginning at approximately 200 East, contains some of the city's oldest single-family homes. They will not be adversely affected by the rezone. West of the subject property is the Central 9th neighborhood. The older single-family residential neighborhood begins approximately a block away, like the neighborhood to the east. This neighborhood is transitioning to more medium density, but the older housing stock still exists. Buffering the site and the residential neighborhood are car dealerships and some medium density apartment buildings along 800 South. There is a midblock walkway connection called out in the Downtown Master Plan between Main Street and West Temple and 800 to 900 South. The site currently has an autobody shop and car dealership on it. If the property to the west is redeveloped in the future, that midblock walkway could connect to the subject property. The rezone is not expected to adversely impact the surrounding community. Furthermore, if the surrounding property owners also apply to rezone their properties to D-1, which has been discussed, the development potential would be the same as the current proposal.

If a hospital is built, the amount of vehicular and pedestrian traffic would increase substantially. The designers would need to review existing city plans that speak to streetscape design, midblock connections, and activation along State and Main Street. The development should rely on the existing TRAX system to get its employees to and from work, promote active transportation, and be an example of how an urban hospital can revitalize a site.

DISCUSSION:

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

The applicant has proposed a map amendment to the subject properties to change the zoning from D-2 Downtown Support District to D-1 Central Business District and a zoning text amendment to section 21A.33.050 Table of Permitted and Conditional Uses for Downtown Districts, which would add four Permitted uses to the D-1 zoning district. The newly permitted uses would include hospitals (including accessory lodging facilities) and indoor and outdoor ambulance services.

It is Planning Staff's opinion that the change in zoning would not negatively impact the character of the area and could actually act as a catalyst in making the area more urban, active, and safe. As such, staff finds that the requested zone change is appropriate when considered in the context of the area and is recommending that the Planning Commission forward a positive recommendation to the City Council. Staff also believes that the proposed Permitted uses in the D-1 zoning district are appropriate and is recommending that the Planning Commission forward a positive recommendation to the City Council regarding the zoning text amendment.

Development plans will be submitted at a later date. The applicant has not provided draft plans to Planning staff, but it is likely that the proposal will be required to go through a Planning process, such as Design Review. If such an application is submitted, it will be reviewed by all applicable city departments. The public will be notified of the proposal and a public hearing will be held prior to the Planning Commission approving or denying the proposal.

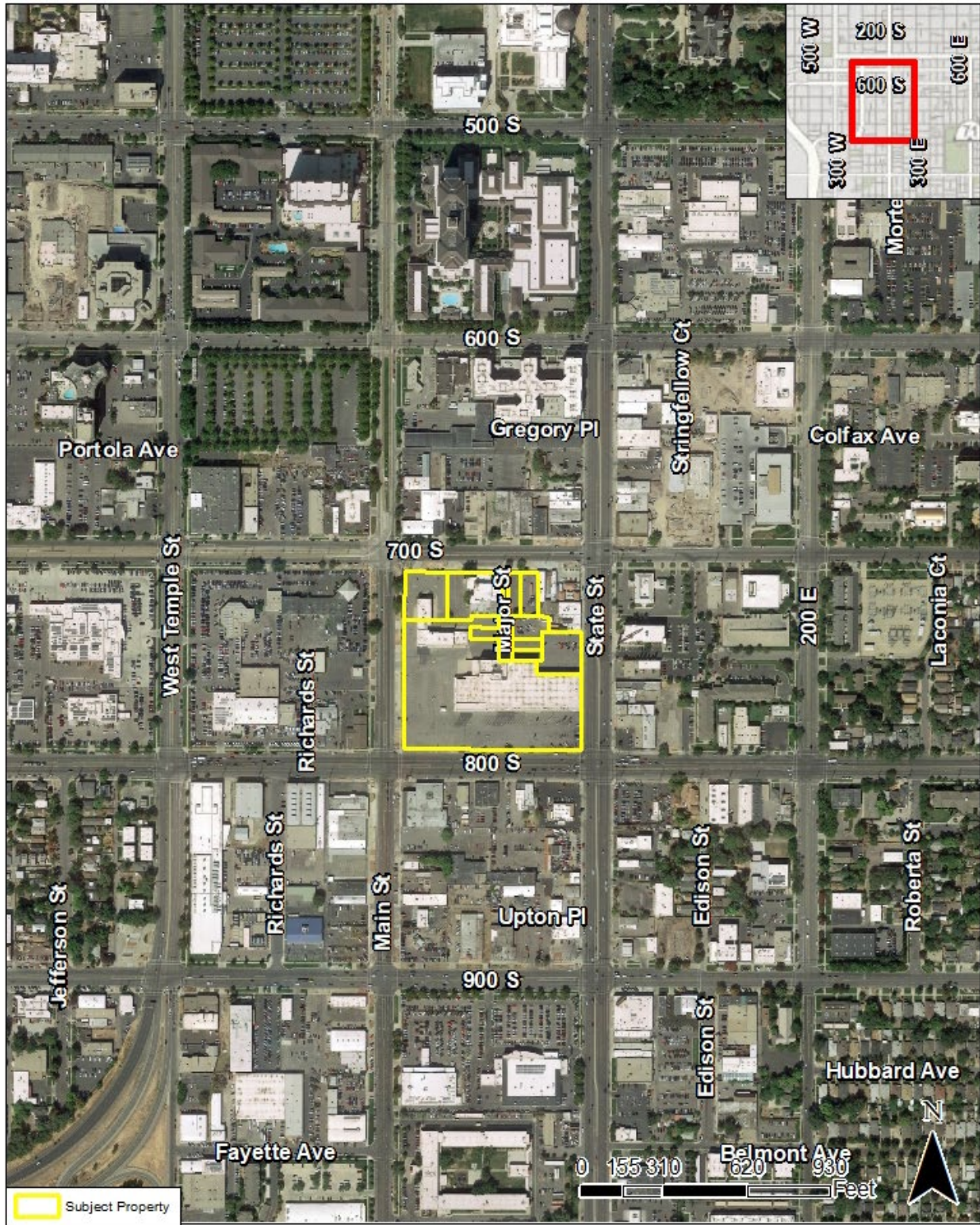
NEXT STEPS:

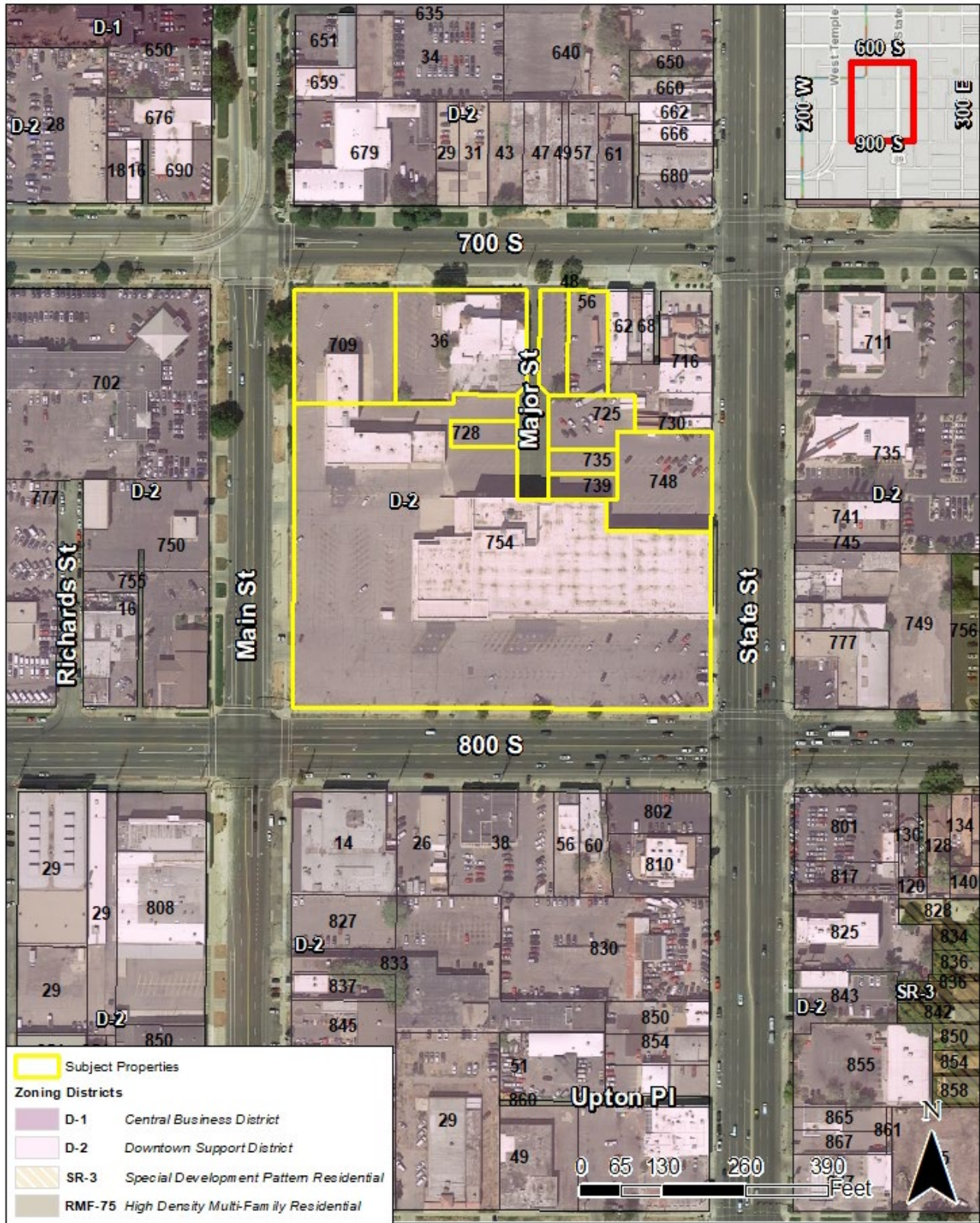
The Planning Commission can provide a positive or negative recommendation for the proposed map and text amendment. The recommendation will be sent to the City Council, who will hold a briefing and additional public hearing on the proposed amendments. The City Council may make modifications to the proposal and approve or decline to approve the proposed zoning map and text amendments. Conditions imposed on the future development of the site could potentially speak to building orientation, midblock connections, open space, urban design, or any other considerations that arise during the review process.

If the zoning map amendment is approved by the City Council, the property owner could propose development and/or land uses that meet the standards of the D-1 Central Business District zoning for the entire property.

If the zoning text amendment is approved, the property owner could develop the site under the D-1 regulations, and hospitals would be a new Permitted use. All the other properties zoned D-1 in the city would be subject to the same regulations and land uses.

ATTACHMENT A: Vicinity & Zoning Maps





Salt Lake City Planning Division 12/9/2022

ATTACHMENT B: Applicant Materials



SALT LAKE CITY PLANNING

Zoning Amendment

Amend the text of the Zoning Ordinance Amend the Zoning Map

OFFICE USE ONLY

Received By:	Date Received:	Project #:
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Name or Section/s of Zoning Amendment:
Map amendment of D-2 Zone to D-1 Zone; Text amendment to D-1 Zone

PLEASE PROVIDE THE FOLLOWING INFORMATION

Address of Subject Property (or Area):
754 S. State St.; 709 S. Main St.; 36/48/56 E. 700 S.; 725/727/728/735/739 S. Major St.

Name of Applicant: Tyler Buswell of Kirton McConkie, Attorney for IHC Health Services, Inc.	Phone: [REDACTED]
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Address of Applicant:
50 E. South Temple, #400, SLC, UT 84111

E-mail of Applicant: [REDACTED]	Cell/Fax:
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Applicant's Interest in Subject Property:

Owner Contractor Architect Other:

Name of Property Owner (if different from applicant):
IHC Health Services, Inc.

E-mail of Property Owner: [REDACTED]	Phone: [REDACTED]
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Please note that additional information may be required by the project planner to ensure adequate information is provided for staff analysis. All information required for staff analysis will be copied and made public, including professional architectural or engineering drawings, for the purposes of public review by any interested party.

AVAILABLE CONSULTATION

If you have any questions regarding the requirements of this application, please contact Salt Lake City Planning Counter at zoning@slcgov.com prior to submitting the application.

REQUIRED FEE

Map Amendment: filing fee of **\$1,075** plus **\$121** per acre in excess of one acre
Text Amendment: filing fee of **\$1,075**, plus fees for newspaper notice.
Plus, additional fee for mailed public notices. Noticing fees will be assessed after the application is submitted.

SIGNATURE

➔ If applicable, a notarized statement of consent authorizing applicant to act as an agent will be required.

Signature of Owner or Agent: 	Date: Nov 11, 2022
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Updated 8/21/2021

KIRTON | M^CCONKIE

Tyler Buswell
50 E. South Temple, Suite 400
Salt Lake City, UT 84111



November 15, 2022

Nick Norris, Director
Salt Lake City – Planning Division
451 S. State St.
Salt Lake City, UT 84111
nick.norris@slcgov.com

RE: Letter in support of application for zoning map and text amendment.

Applicant: Kirton McConkie
Attn: Tyler L. Buswell
50 E. South Temple Street, #400
Salt Lake City, Utah 84111
(801) 321-4820
tbuswell@kmclaw.com

Property Addresses: 754 S. State St.
709 S. Main St.
36, 48, and 56 E. 700 S.
725, 727, 728, 735, and 739 S. Major St.
All of S. Major St.
Salt Lake City, UT 84111
As more fully described in Exhibit A
(collectively, the “Property”).
Totaling approx. 9.22 acres.

Amendments Requested: Zoning map amendment of the Property from the D-2 Zone to the D-1 Zone. And zoning text amendment to the D-1 Zone to allow hospitals as a permitted use.

Application Fees: \$2,036.95 for map amendment (\$1,075 + \$121 x 7.95 acres).
\$1,075 for text amendment.

Dear Mr. Norris:

This law firm represents IHC Health Services, Inc. (“Intermountain”), which is the owner of the Property described above. This letter accompanies the zoning map and text amendment application submitted concurrently with this letter. The purpose of this letter is to address the submittal requirements of the City’s Zoning Amendment application form. Specifically, this letter will provide the following: (1) a statement declaring the purpose of the amendment, (2) a description of the proposed use of the property being rezoned, (3) the reasons why the present zoning may not be appropriate for the area, (4) the parcel numbers for each parcel affected by the proposed map amendment, and (5) the requested text revisions to the applicable zoning ordinance. Intermountain and our firm look forward to working with the City regarding this application. We hope to create an outcome that will benefit the City, the Property, and residents of Salt Lake City.

(1) Purpose for the amendment.

Intermountain proposes to amend both the zoning map and the applicable text of the D-1 zone. The Property is comprised of 10 separate tax parcels where the old Sears building is located and an old, unused right of way (S. Major St.), all of which is situated just south of downtown Salt Lake City. The current zoning of all such parcels is the D-2 Downtown Support District zone, and Intermountain proposes to amend the zoning map to the D-1 Central Business District zone. As explained further in paragraph (5) below, Intermountain also proposes to amend the text of the D-1 zone to allow Hospitals as a permitted use, along with other uses to be designated as either permitted or conditional uses.

Accordingly, the purpose of these proposed amendments is to allow for the re-development of the majority of the Sears block to accommodate a new, downtown, urban hospital. As the City has known for some time, the Sears property has been in dire need of improvement and redevelopment for many years. The unique location of the block, directly on the southern border of downtown and right along State Street, makes it a prime location for a unique project in general, and an urban hospital in particular.

The amendment to D-1 will allow for the maximum flexibility on the Property to create a project that can both function as part of the downtown core, but also facilitate a transition from the downtown uses to the supporting uses of the D-2 zone. Moreover, the amendment will allow the Property to best meet the City’s vision for the South State area as described in the Downtown Master Plan.

(2) Description of the proposed use of the property being rezoned.

While Intermountain has not created any formal or conceptual plans for the Property, the hospital use would be akin to many urban hospitals across the country.

The project would create and serve as an anchor and bookend on the south end of downtown. The current border of the D-1 zone is less than half a block away to the northwest of the Property, and approximately half a block away directly to the north of the Property, so a hospital project would not only fit with the existing development pattern in the surrounding area, but it would serve to revitalize the area. The hospital would include the typical necessary accompanying uses for a hospital.

(3) Reasons why the present zoning may not be appropriate for the area.

The current zoning of D-2 for the Property is not appropriate because it has created a site that is underperforming and is not the highest and best use for the Property. The Property has sat largely vacant and underutilized for so long because the D-2 zone does not foster and has not attracted the type of users and uses that this site will support. Because the Property is located in a transition block from D-1 to D-2, it has created a circumstance where more traditional downtown uses, such as high-rise office or residential projects are not well suited, and the economics of lower-rise commercial, office, or residential uses are not as financially viable.

The proposed use of a hospital can bridge the gap of those drawbacks created by the Property's location. The D-1 zone will allow Intermountain the flexibility in building height while also not being out of character for the area with the Grand America being two blocks away, and the new multi-story office/residential projects built on 600 South and Main Street, 700 South Main Street, and 600 South State Street. The D-1 zone's building height and density flexibility will also help Intermountain in working with the City to design a project that better incorporates permeability and walkability of the Property that would not otherwise be possible given the small area of the Property compared to the level of services Intermountain desires to include on the Property.

Amending the Property to D-1 will also be in line with the City's vision of the "South State" area in its Downtown Master Plan. A hospital will accomplish the goals of re-urbanizing South State while not disrupting the integrity of the neighborhoods to the east. It would also serve those neighborhoods by providing needed healthcare services within walking distance to many residents.

The current state and zoning of the Property has failed to live up to or satisfy the City's vision for the area. So, Intermountain would strive to cooperate with the City in its efforts to implement the Downtown Master Plan goals for this site. A hospital can blend and accomplish the City's desired outcomes for this area.

(4) Parcel numbers to be changed from D-2 to D-1 on the Zoning Map.

The following parcels are all proposed to be changed from D-2 to D-1 on the City's Zoning Map:

Address	Parcel Number	Approx. Acreage
709 S. Main St.	16-07-103-001-0000	0.66
56 E. 700 S.	16-07-103-004-0000	0.24
728 S. Major St.	16-07-103-008-0000	0.10
725-727 S. Major St.	16-07-103-009-0000	0.25
754 S. State St.	16-07-103-017-0000	0.55
735 S. Major St.	16-07-103-010-0000	0.10
739 S. Major St.	16-07-103-011-0000	0.10
36 E. 700 S.	16-07-103-002-0000	0.81
48 E. 700 S.	16-07-103-003-0000	0.17
754 S. State St.	16-07-103-022-0000	5.97
All of S. Major St.	None	

(5) Requested text amendments to the D-1 Zone.

Currently, a hospital is not specifically designated in the table of permitted and conditional uses for the D-1 zone. Consequently, in addition to the requested map amendments, Intermountain proposes the following text amendments to the D-1 zone.

(a) Edit to 21A.33.050, Table of Permitted and Conditional Uses For Downton Districts.

Intermountain proposes to add the following uses to Table 21A.33.050:

- “Ambulance service (indoor): Permitted.”
- “Ambulance service (outdoor): Permitted.”
- “Hospital, including accessory lodging facility: Permitted.”
- “Retail, sales and service accessory use when located within a principal building and operated primarily for the convenience of employees: Permitted.”

(Note that the following uses that may be incorporated into the proposed hospital are already either permitted or conditional uses in the D-1 zone as shown on Table 21A.33.050: Bio-medical facility (permitted); medical clinic (permitted); heliport (conditional use); laboratory, medical related (permitted); mixed-use development (permitted); office (permitted).)

We look forward to working with the City on these proposed changes. Please feel free to contact me at [REDACTED] if you would like to discuss.

Sincerely,

Kirton McConkie

A handwritten signature in blue ink, appearing to read 'TLB', with a long horizontal flourish extending to the right.

Tyler L. Buswell
Counsel for Intermountain

Exhibit A

Legal Description of the Property

Real property located in Salt Lake County, Utah, more particularly described as follows:

PARCEL 1 (16-07-103-001-0000):

COMMENCING AT THE NORTHWEST CORNER OF LOT 5, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY AND RUNNING THENCE EAST 160 FEET; THENCE SOUTH 179 FEET; THENCE WEST 160 FEET; THENCE NORTH 179 FEET TO THE PLACE OF BEGINNING.

PARCEL 2 (16-07-103-004-0000):

BEGINNING AT THE NORTHEAST CORNER OF LOT 7, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY AND RUNNING THENCE WEST 62.5 FEET; THENCE SOUTH 165 FEET; THENCE EAST 62.5 FEET; THENCE NORTH 165 FEET TO THE PLACE OF BEGINNING.

PARCEL 3 (16-07-103-008-0000):

PART OF LOTS 6 AND 7, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY, AND COMMENCING 206.25 FEET SOUTH OF THE NORTHEAST CORNER OF LOT 6, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY; THENCE WEST 82.5 FEET; THENCE SOUTH 41.25 FEET; THENCE EAST 105 FEET; THENCE NORTH 41.25 FEET; THENCE WEST 22.5 FEET TO THE PLACE OF BEGINNING.

PARCEL 4 (16-07-103-009-0000):

COMMENCING AT A POINT 165 FEET SOUTH AND 44 FEET EAST OF THE NORTHWEST CORNER OF LOT 8, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY AND RUNNING THENCE SOUTH 57.75 FEET; THENCE WEST 27.5 FEET; THENCE SOUTH 27.5 FEET; THENCE WEST 109 FEET; THENCE NORTH 85.25 FEET; THENCE EAST 136.5 FEET TO THE PLACE OF BEGINNING.

PARCEL 5 (16-07-103-017-0000, 16-07-103-010-0000, 16-07-103-011-0000):

COMMENCING AT THE SOUTHEAST CORNER OF LOT 8, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY AND RUNNING THENCE SOUTH 49.5 FEET; THENCE WEST 165 FEET; THENCE NORTH 49.5 FEET; THENCE WEST 92.5 FEET; THENCE NORTH 79.75 FEET; THENCE EAST 109 FEET; THENCE NORTH 27.5 FEET; THENCE EAST 148.5 FEET; THENCE SOUTH 107.25 FEET TO THE PLACE OF BEGINNING.

PARCEL 6 (16-07-103-002-0000):

BEGINNING AT A POINT 160 FEET EAST OF THE NORTHWEST CORNER OF LOT 5, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY, AND RUNNING THENCE EAST 87.5 FEET; THENCE SOUTH 179 FEET; THENCE WEST 87.5 FEET; THENCE NORTH 179 FEET TO THE PLACE OF BEGINNING.

ALSO: BEGINNING AT A POINT 4 FEET WEST OF THE NORTHEAST CORNER OF LOT 6, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY, AND RUNNING THENCE WEST 78.5 FEET; THENCE SOUTH 165 FEET; THENCE EAST 78.5 FEET; THENCE NORTH 165 FEET TO THE PLACE OF BEGINNING.

ALSO: BEGINNING AT THE NORTHWEST CORNER OF LOT 7, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY, AND RUNNING THENCE EAST 37.5 FEET; THENCE SOUTH 148.5 FEET; THENCE

SOUTHWESTERLY 22.4 FEET TO A POINT 165 FEET SOUTH AND 22.5 FEET EAST OF THE NORTHWEST CORNER OF LOT 7; THENCE WEST 26.5 FEET; THENCE NORTH 165 FEET; THENCE EAST 4 FEET TO THE PLACE OF BEGINNING.

PARCEL 7 (16-07-103-003-0000):

BEGINNING 57.5 FEET EAST OF THE NORTHWEST CORNER OF LOT 7, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY, AND RUNNING THENCE EAST 45 FEET; THENCE SOUTH 165 FEET; THENCE WEST 30 FEET; THENCE NORTHWEST 22.4 FEET, MORE OR LESS, TO A POINT 148.5 FEET SOUTH FROM THE POINT OF BEGINNING; THENCE NORTH 148.5 FEET TO THE PLACE OF BEGINNING.

PARCEL 8 (16-07-103-022-0000):

TRACT 1: COMMENCING AT THE SOUTHEAST CORNER OF LOT 1, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY AND RUNNING THENCE NORTH 17 RODS; THENCE WEST 10 RODS; THENCE NORTH 3 RODS; THENCE WEST 142.5 FEET; THENCE NORTH 5 RODS; THENCE WEST 105 FEET; THENCE NORTH 68.5 FEET; THENCE WEST 15 RODS; THENCE SOUTH 239 FEET; THENCE EAST 10 RODS; THENCE SOUTH 21 FEET; THENCE WEST 10 RODS; THENCE SOUTH 221 FEET; THENCE EAST 660 FEET TO THE PLACE OF BEGINNING.

TRACT 2: BEGINNING 165 FEET SOUTH FROM THE NORTHEAST CORNER OF LOT 6, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY AND RUNNING THENCE EAST 22.5 FEET; THENCE SOUTH 41.25 FEET; THENCE WEST 105 FEET; THENCE NORTH 41.25 FEET; THENCE EAST 82.5 FEET TO THE BEGINNING.

TRACT 3: BEGINNING AT A POINT 88 FEET SOUTH FROM THE NORTHWEST CORNER OF LOT 4, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY AND RUNNING THENCE SOUTH 21 FEET; THENCE EAST 165 FEET; THENCE NORTH 21 FEET; THENCE WEST 165 FEET TO THE POINT OF BEGINNING.

PARCEL 9 (S. Major St.):

PARCELS 3, 4, 5, 6, 7 AND 8 DESCRIBED ABOVE ARE TOGETHER WITH THE FOLLOWING:

A RIGHT OF WAY IN COMMON WITH OTHERS: COMMENCING 37.5 FEET EAST FROM THE NORTHWEST CORNER OF LOT 7, BLOCK 16, PLAT "A", SALT LAKE CITY SURVEY AND RUNNING THENCE SOUTH 148.5 FEET; THENCE SOUTHWEST 22.5 FEET, MORE OR LESS, TO A POINT 142.5 FEET WEST AND 165 FEET NORTH FROM THE SOUTHEAST CORNER OF SAID LOT 7; THENCE SOUTH 165 FEET; THENCE EAST 50 FEET; THENCE NORTH 165 FEET; THENCE NORTHWEST 22.5 FEET, MORE OR LESS, TO A POINT 107.5 FEET WEST AND 11 RODS NORTH FROM THE SOUTHEAST CORNER OF SAID LOT 7; THENCE NORTH 148.5 FEET; THENCE WEST 20 FEET TO THE PLACE OF BEGINNING.

ATTACHMENT C: **Property & Vicinity Photographs**

STATE STREET FRONTAGE



Subject Property – Facing West



Businesses adjacent to the site to the North



Subject Property – Corner of 800 S State Street



Vacant buildings across from the site on State Street

800 SOUTH FRONTAGE



Subject Property – Facing Northwest towards Downtown



Subject Property – Facing North towards Downtown



800 South – Facing East



800 South – Facing West

MAIN STREET FRONTAGE



Subject Property – Facing East



Subject Property – Facing Northeast



Main Street – Facing North towards Downtown



Property directly West of the site

700 SOUTH FRONTAGE



Subject Property – Facing South



Subject Property – Facing East



Property directly North of the site



Businesses adjacent to the site to the East

ATTACHMENT D: Analysis of Standards – Standards for General Amendments

ZONING MAP AMENDMENT

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

FACTOR	FINDING	RATIONALE
<p>1. Whether a proposed map amendment is consistent with the purposes, goals, objectives, and policies of the city as stated through its various adopted planning documents;</p>	<p>The proposed amendment is generally consistent with the goals and policies of the applicable master plans.</p>	<p>Various purposes, goals, objectives, and policies identified in City documents including Plan Salt Lake and the Downtown Master Plan are consistent with the proposed changes.</p> <p>This is further articulated and discussed in the Key Considerations section of this report.</p>
<p>2. Whether a proposed map amendment furthers the specific purpose statements of the zoning ordinance.</p>	<p>The proposal generally furthers the specific purpose statements of the zoning ordinance.</p>	<p>The purpose of the Zoning Ordinance is to promote the health, safety, morals, convenience, order, prosperity and welfare of the present and future inhabitants of Salt Lake City, to implement the adopted plans of the city, and, in addition:</p> <ul style="list-style-type: none"> A. Lessen congestion in the streets or roads; B. Secure safety from fire and other dangers; C. Provide adequate light and air; D. Classify land uses and distribute land development and utilization; E. Protect the tax base; F. Secure economy in governmental expenditures; G. Foster the city's industrial, business and residential development; and H. Protect the environment. <p>The proposed map amendment to change the zoning from D-2 to D-1 would uphold the</p>

		<p>general zoning ordinance and would not adversely affect the health, safety, or welfare of current or future residents.</p> <p>The purpose of the D-1 zoning district is to provide for commercial and economic development within the City’s more urban and intense areas. The subject property is within the Downtown Master Plan area, which calls for supporting the growth of the central business district up to 900 South.</p> <p>Even though a development proposal has not been shared, it will be expected that the property owner submits a design that meets the purpose of the D-1 zone below.</p> <p>“Development is intended to be very intense with high lot coverage and large buildings that are placed close together while being oriented toward the pedestrian with a strong emphasis on a safe and attractive streetscape and preserving the urban nature of the downtown area. This district is appropriate in areas where supported by applicable master plans. The standards are intended to achieve established objectives for urban design, pedestrian amenities and land use control.”</p>
<p>3. The extent to which a proposed map amendment will affect adjacent properties;</p>	<p>The change in zoning is not anticipated to create any substantial new negative impacts that wouldn’t be anticipated with the current zoning.</p>	<p>The primary difference between the D-2 zone and the D-1 zone is the permitted height. The maximum building height in the D-2 zone is 120 feet, with Design Review approval. There is no maximum building height in the D-1 zone if the development meets the Design Review standards.</p> <p>City staff supports additional height, but in return expects a high level of design that is pedestrian-oriented, contains active ground floor uses, and contributes to the character of the neighborhood.</p> <p>While the D-2 zoning district does have more design standards in place, the proposed Building Heights & Street Activation text amendment that has been transmitted to the City Council would establish new design standards in the D-1 zone that ensure the site</p>

		is developed to meet internal programming requirements (such as having safe ambulance entrance locations) and contribute to the neighborhood.
4. Whether a proposed map amendment is consistent with the purposes and provisions of any applicable overlay zoning districts which may impose additional standards.	There is no applicable overlay district that imposes additional development standards on this property.	
5. The adequacy of public facilities and services intended to serve the subject property, including, but not limited to, roadways, parks and recreational facilities, police and fire protection, schools, stormwater drainage systems, water supplies, and wastewater and refuse collection.	The redevelopment of the site will require public facility upgrades.	<p>The proposal was reviewed by all applicable city departments. Full review comments are in Attachment F.</p> <p>The impact to city utilities and services is not anticipated to change based on the rezoning of the property, but if the text amendment is approved and a hospital is ultimately built, the applicant will be required to upgrade offsite water, sewer, and stormwater systems.</p> <p>Public Utilities stated, <i>“Public Utility conditions for rezone and text amendments include offsite water, sewer, and stormwater quality improvements. The increased demand will require the replacement of water mains in State Street, 500 South, Main Street and 700 South. Offsite sewer system must be evaluated, and upgrades will be required as determined by demands and system modeling. The project site drains directly to the storm drain system that connects to the Jordan River, approximately 1.6 miles to the west. Stormwater quality will be very important during construction and for future long-term maintenance. These improvements will be required as part of the building permit for future buildings.”</i></p>

ZONING TEXT AMENDMENT

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

FACTOR	FINDING	RATIONALE
<p>1. Whether a proposed text amendment is consistent with the purposes, goals, objectives, and policies of the city as stated through its various adopted planning documents;</p>	<p>The proposed amendment is generally consistent with the goals and policies of the applicable master plans.</p>	<p>Various purposes, goals, objectives, and policies identified in City documents including Plan Salt Lake and the Downtown Master Plan are consistent with the proposed changes.</p> <p>This is further articulated and discussed in the Key Considerations section of this report.</p>
<p>2. Whether a proposed text amendment furthers the specific purpose statements of the zoning ordinance.</p>	<p>The proposal generally furthers the specific purpose statements of the zoning ordinance.</p>	<p>As discussed in the zoning map analysis above, the purpose of the D-1 zoning district is to provide for commercial and economic development within Salt Lake City’s most urban and intense areas.</p> <p>Adding hospitals and their complementary uses, like retail sales and services, provides an economic opportunity that would otherwise not be offered. Hospitals employ thousands and provide services necessary in a thriving city center.</p> <p>It is not expected that additional hospitals or ambulance services will be built in the downtown area, as the need would be fulfilled by this project. There are also very few opportunities to redevelop a site that is 9 acres, which is small for an urban hospital but still requires using approximately 90% of the block.</p>
<p>3. Whether a proposed text amendment is consistent with the purposes and provisions of any applicable overlay zoning districts which may impose additional standards.</p>	<p>The change in zoning is not anticipated to create any substantial new negative impacts that wouldn’t be anticipated with the current zoning.</p>	

<p>4. The extent to which a proposed text amendment implements best current, professional practices of urban planning and design.</p>	<p>The redevelopment of the site will require public facility upgrades.</p>	<p>The current D-1 zoning district lacks sufficient design standards, which has been acknowledged by the City. To remedy this, Planning staff have transmitted an ordinance to the City Council that includes updated design standards that will impact all of the downtown zoning districts, as well as other districts within the downtown area.</p> <p>The Downtown Building Heights & Street Activation ordinance would help ensure that the proposed urban hospital is developed using best planning and design practices. It is currently waiting to go before the City Council for a public hearing and vote.</p>
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ATTACHMENT E: **Public Process & Comments**

Public Notice, Meetings, Comments

Public comments regarding the project are included in the staff report. At the time of the staff report being published, Planning staff received 4 public comments and a joint Community Council statement related to the proposal.

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

- Early notification notices mailed out December 12, 2022
 - Notices were mailed to property owners/residents within ~300 feet of the proposal.
- The Planning Division provided a 45-day comment period (December 8, 2022 – January 24, 2023) notice to the associated community councils for the property. The notice solicited comments from the following recognized organizations: Ballpark, Central 9th, Central City, and Downtown Community Councils, and the Downtown Alliance.
 - The Community Councils held a joint public meeting on January 19, 2023. The applicants, residents, and city staff attended the meeting. The councils submitted a letter than is included in the staff report.
- An online open house has been posted to the Planning Division’s webpage since December 12, 2022. The page remains open for review. No comments have been received.

Notice of the public hearing for the proposal included:

- Public hearing notice mailed on March 10, 2023
- Public hearing notice posted on March 10, 2023
- Public notice posted on City and State websites and Planning Division list serve on March 10, 2023

Heather Wall
CEO, LDS Hospital
Intermountain Healthcare
36 South State Street
Salt Lake City, Utah 84111

CC: Michael O. Leavitt, Chair, Intermountain Board of Trustees
Bentley Peay; Adam Jensen; Clay Ashdown

To our friends and future neighbors at Intermountain Healthcare,

With this letter, **we want to welcome you into our community and take this opportunity to establish a productive and direct line of communication.** We are eager to see you succeed in building what should be a vital community resource for generations to come—and could very well raise awareness of Intermountain Healthcare’s innovative spirit on the global healthcare stage. To that end, we have organized our early input into a list of discussion placeholders that can be used as a starting point in a substantive and long-term community input effort.

We invite you to establish a community advisory council to get continuous and meaningful input from the community—not only in the early stages of development but also for your long-term residency, Downtown.

The items for discussion, enumerated below, fall into roughly three categories: 1) healthy community development principles, 2) community integration strategies, and 3) urban design best practices. We appreciate that Intermountain Healthcare has been very clear about its responsibility and commitment to support and develop healthy communities (category #1). We are anxious to show you how your thought leadership on these topics can be practically translated into reality within our specific community (category #2). Lastly, we understand that you will likely need to bring in outside expertise to design a campus that is truly urban-appropriate (category #3). Collectively, this group has a lot of relevant experience that we’d like to make available to your planning teams.

Our goal in coming to you at this early stage is to ensure that you can integrate the needs of the community from the start. Again, Intermountain Healthcare has an opportunity to build a healthcare campus that could positively impact the Downtown community into the next century (and beyond) and we want to help this project fulfill its potential.

To that end, we urge you—and the City of Salt Lake, as a development partner—to take into account the following guidance:

- 1. Enable your staff to live Downtown**—This starts with paying a regionally appropriate living wage but also, as explained below, on-site staff housing. Other regional employers have made use of novel approaches like housing vouchers for those willing to live within biking distance, use of a small fleet of electric vehicles for staff households who forgo a second car, etc.
- 2. Invest in a healthy pedestrian experience** through thoughtful design and deployment of strategic amenities for people walking, people riding bikes, and people who use assistive devices. Consider partnering with Salt Lake City in extending their pedestrian-priority plans for Main Street all the way to 900 South and in bringing new energy to the long-awaited Life on State program. Prioritize people who travel by transit as you orient key entrances.
- 3. Design for a future that is less dependent on personal vehicles.** One or two small freestanding parking structures would allow for greater flexibility for design and avoid the logistical and financial burdens of folding parking into a building—especially given an uncertain future for its need.
- 4. Activate every stretch of sidewalk** along each block face—both during and after traditional “business hours”. Pedestrians should not be faced with long stretches of windowless facades, service entrances, or ambulance bays—all of which should be located in purpose-built alleyways.
- 5. Bring actual staff apartments and condos** into the heart of the development. Affordable housing starts with the choice to house our own labor force. Consider, also, assisted living, caregiver/family stay accommodations and ways to deliver healthcare services to the area’s several hotels.
- 6. Grow the sales and property tax capacity** of the site through the injection of for-profit uses and ownership. Without purposefully planning for a mixed-owner and mixed-tenant development, the Intermountain Healthcare campus will deny local tax coffers of much-needed funding for essential services.
- 7. Connect to the surrounding blocks**—physically and financially. That includes mid-block crossings and strategically placed pedestrian corridors that allow folks to easily move through the block. It also means identifying neighborhood cultural and economic assets and committing to their success. Redevelopment shouldn’t result in displacement. With thoughtful planning, area gems like Sapa, Salt Lake Barber Co, and the Hein art studio can be beneficiaries instead of casualties of your investments in this block.

- 8. Be a full partner in the neighborhood’s work as a host to services for those experiencing homelessness.** Partner with service providers to improve and compliment their offerings and inoculate the neighborhood against anti-social behavior by designing for, attracting, and sustaining a wealth of diverse positive economic and social uses—with special care taken for evening and night uses.
- 9. Prioritize neighborhood engagement of Intermountain Healthcare staff, clients, and visitors** by identifying services that could be shared with the community. Dining services, gyms, daycares, meeting spaces, and parking should be externalized and staff “sidewalk time” maximized. Getting staff out of their offices and into the streets serves both staff and community wellbeing. To the extent possible, don’t segregate staff entrances.
- 10. Model the density that should, in a decade’s time, surround it**—both in terms of structural density and density of use. And not simply dense, but diverse as well. In other words: Evolve beyond the sprawling single-use template employed at the Intermountain Medical Center in Murray. Daycare, retail, fitness (Downtown currently has no public swimming facility), business services, dining, grocery (Wasatch Co-op Market has long sought a Downtown presence) would each contribute to a rich and resilient neighborhood.
- 11. Divide the block into three or four smaller blocks**, as called for by Salt Lake City leaders since the 1960s. Sidewalks are powerful economic and cultural engines. Subdividing the block would more-than-double the development’s social and economic impacts.
- 12. Re-parcel each block** (“replat”) to something closer to the 32 parcels-per-block the rest of Downtown enjoys. Multiple, smaller buildings (that may still be quite tall) pay big dividends for density, diversity, and redevelopment. Smaller parcels promote more fine-grained development, which offer a host of benefits. Perhaps chief among them, is the ability for Intermountain Healthcare to replace buildings with surgical precision as the healthcare and economic landscapes evolve.
- 13. Commit to a sustainable and resilient campus**—one that incorporates LEED certification, participation in the City’s various sustainability initiatives, and support for idle-free ambulance docking and freight delivery. Additionally, the development should feature well-designed green spaces—which should be realized through a mix of an at-grade pocket park, above-grade privately-owned public spaces (POPS), and a verdant streetscape.

Intermountain Healthcare serves as an important cultural and social institution in our state—reflected in its tax-free status. Your organization, therefore, bears a unique responsibility to design and build its facilities in such a way that your mission is so reflected. We're encouraged in our efforts by your recent participation in Mayor Erin Mendenhall's healthcare innovation blueprint discussions, which speaks volumes to your team's awareness of and investment in many of the issues we outline above.

Once again, we invite Intermountain Healthcare to meet with us for a substantive, productive, and public round of feedback as part of a permanent, long-term mechanism for meaningful community input.

We are eager to help you build something special in the Downtown community.

Respectfully,

Downtown Community Council
Ballpark Community Council
Central 9th Community Council
Central City Community Council
Midtown Business District
Downtown Alliance
Neighbors for More Neighbors
Sweet Streets
Jennifer Plumb (Utah Senator, District 9)
Ralph Becker (frm Salt Lake City Mayor)
DCHarrison
Redstone Health

From: [LYNN Pershing](#)
To: [Roman, Amanda](#)
Subject: (EXTERNAL) Petition Number: PLNPCM2022-01109
Date: Tuesday, January 24, 2023 9:06:23 AM

It appears there is no end to changes in zoning for this facility. I am left wondering Why we have zoning code at all?

I do support medical facilities at this site, but it should be an satellite for the main IHC campus much like the Sugarhouse UU medical facility - an accessory to the main medical campus

Lynn K Pershing

Sent from my iPhone

From: [Henry Murray](#)
To: [Roman, Amanda](#)
Subject: (EXTERNAL) IHC 745 S State
Date: Tuesday, January 24, 2023 12:41:04 PM

Hey! I just wanted to leave a short message about how I feel SLC should evolve. The city is simply too big to have a small skyline like it does currently. Please raise the zoning to D1 in this block so we can slowly build up the skyline. But also please increase the height maximum from 375 to 450 in D1 zoning without design review. This will help attract more taller buildings.

Thank You

-Henry Murray

From: [Lucas Hanover](#)
To: [Roman, Amanda](#)
Subject: (EXTERNAL) PLNPCM2022-01109
Date: Tuesday, January 24, 2023 10:07:53 PM

Hello,

I am a resident who live near the old sears site, around 300e 1300s.
Please grant the requested amendments to change the old sears site from D2 to D1 zoning. The hospital will be a welcome improvement.

That is all.

Lucas




INVESTMENT GROUP

Hoang Nguyen
[REDACTED]
[REDACTED]

February 1, 2023

Dear Planning Commission and Salt Lake City Council:

Please accept this letter as Sapa Investment Group's official comments regarding the request made from Intermountain Health to rezone their parcel from D-2 to D-1. The Sapa Group supports this request with three recommendations noted below. We view this as an opportunity to make significant changes that will lend to The Downtown Plan, adopted by Salt Lake City in 2016, that sets out to "enhance the pedestrian experience and livability of the Downtown area."

The Sapa Group has heavily invested in this area of South State for over 15 years. Through our hospitality businesses and our medical pharmacy, we draw over 15,000 customers and patients weekly to this area. We have continued to promote and encourage the development of South State through some of the following efforts:

- established *Midtown Business District (Midtown)* that meets monthly with other stakeholders to discuss economic vitality, safety concerns and joint efforts to grow the area
- serve on the advisory committee for the *Geraldine E. King Resource Center (GEK)*
- created *Rise & Revive* that provides monetary stipends and ongoing support for weekly neighborhood clean-up with GEK residents and our employees
- worked closely with the City to create the master plan for *Life on State*
- created & hosted the first annual *Midtown Pride Festival* which had over 6,000 attendees
- created *Utah Grown* community event hosted annually in the Spring for last two years

The Sapa Group has dedicated our time and resources to help establish the economic momentum and community-pride that we experience today. Midtown has huge potential for being home to more diverse and eclectic businesses that will continue to attract people from all over the valley and the State. The development of a hospital on 9-acres in Midtown can either add to a growing urban landscape, if thoughtfully designed, or stifle the growth and potential that has been so delicately crafted over the last decade and a half. We choose to believe the former; where an urban hospital, especially one with Intermountain Health's proven record of being a tremendous community partner, will lend to the vibrancy and growth of this downtown area.

In our support for the rezone request made by Intermountain Health, The Sapa Group asks that the City and Intermountain Health consider a development agreement to incorporate the following three recommendations. These will assure that the final development adheres to the spirit of The Downtown Plan which is crucial to a fully realized urban landscape.

1. **Commercial Storefronts on State** – street activation is central to economic health. State St. needs more ground level stores to add vitality to the area and be a catalyst to encourage a high-density commercial corridor. Though Intermountain's core business is to provide world-class healthcare, commitment to an urban hospital means taking great considerations to the needs of

722 South State Street, Salt Lake City, Utah 84111

its urban surroundings. Where this is brand-new construction from the ground up, Intermountain Health has the prime opportunity to design a layout that would serve its logistical needs while also benefiting the economic engine of Midtown. Moreover, on the note of safety, this project area is across the Geraldine King Homeless Resource Center. The peak of hospital activity tends to subside in the evening. With open and active businesses that allow public enjoyment, there will be more eyes and ears in the evening to discourage loitering and criminal activities. We ask that a development agreement be crafted to ensure that at least 75% of the ground level of any of the building facing State Street be planned for commercial uses with external public access directly onto State St. These could include the hospital's coffee shop, gift shop, pharmacy, cafeteria, etc. In addition, Intermountain Health should also include some uses that will be open and activated during evening hours such as leased space for non-hospital related businesses.

2. **Midblock Crossing on State St. Coordinated with Midblock Streets** – as part of its Walkable goals, The Downtown Plan calls out an initiative that “prioritize location of mid-block crossings in coordination with mid-block streets and walkways.” Incorporating mid-block walkways and streets optimizes large blocks for pedestrian movement and provides choices to safely move about the block. In addition, a key tenant to Life on State is to slow traffic on State St. to make it more pedestrian-friendly. Midblock crossing breaks up large blocks making it easier for pedestrians to access businesses and encourages cars on State St. to slow down and use caution around the pedestrian crossings. We ask that a development agreement be crafted to ensure that mid-block crossings or streets that would be open to public access be built and maintained in both the N/S and E/W directions.
3. **Design & Construction Material** – as laid out in the Downtown Plan, this hospital is located in the South State area, which is essentially the gateway into downtown. For many, this will be the first high-rise building they see as they enter downtown; setting the tone for what they will experience in downtown Salt Lake. The Plan calls for “Quality Architecture and Construction Practices” and seeks to “explore a design review process for projects of special significance to ensure a distinctive and enduring place... Include natural elements in mid-block walkways to soften hardscapes and contribute to a comfortable microclimate and aesthetic experience. Encourage active ground floor design and uses along mid-block walkways to support pedestrian activity, such as outdoor dining, merchandising, signage, and building access.” The concepts called out in this Downtown Plan are not novel ideas, but rather commonly found in large urban areas that have successfully blended urban living with institutional businesses such as hospitals. For its first urban hospital, this is Intermountain Health's opportunity to showcase its ingenuity in design and what the future of healthcare could look like. We ask that these goals be incorporated into the development, perhaps by requiring that the project be reviewed by an internal city design review committee or by a committee formed of internal city staff and external stakeholders.

We stand at a unique juncture where this development can be the catalyst needed to elevate the gateway to downtown or another standard high-rise that only serves its insular purpose. By stating that they intend to develop an “urban hospital,” Intermountain Health has signaled that they are willing to think outside of the box. The Downtown Plan has laid out the groundwork for best scenarios to create a true livable urban area.

We strongly support the implementation of these core tenants of The Downtown Plan as a requisite for granting the rezone request.

The Sapa Group looks forward to welcoming our new neighbors and collaborating together on ways to be community partners and stewards of this incredible part of downtown. Thank you for your time and consideration.

Sincerely,

Hoang Nguyen
Co-Founder & Managing Partner
Sapa Investment Group

ATTACHMENT F: Department Review Comments

Planning Staff Note: City departments, including Building Services, Housing Stability, Engineering, Transportation, Sustainability, Police, Public Lands, and Public Services did not provide any concerns with the zoning map or text amendment.

Economic Development: Comments provided by Peter Makowski

Economic Development is in full support of this text amendment and have no comments regarding the proposed rezone. Comments regarding the proposed hospital development are below:

- Encourage this development to be a case study of how an urban hospital activates a neighborhood by:
- Increasing foot traffic and decreasing automobile traffic.
- Break up the block with midblock streets, pathways, alleyways, etc. Make it interesting and pull human in with human scale development.
- Reparcel the block, break it up and promote the flexibility of a changing landscape in our state and city's growth and evolution in health care (for example: care will be more mobile and taken to the patient- solve for this now at least in the ability to flex into this trajectory. Plan.)
- Promotes the use of public transportation; specifically, trax stop and bus routes.
- Activate the first, second, and third levels of the proposed development.
- Incorporate green space into the block (which should be negotiated with additional height going from D-2 to D-1).
- Work closely with the existing neighborhood businesses and residents to encourage activation and utilization with the hospital (partnership agreements, coordination in development, etc.).
- Encourage the incorporation of housing into the block that is mixed with deeply affordable, affordable, market rate, and above market rate. Promote housing and its role in the health of our community that reflects the users who will utilize the hospital as patients, visitors, patrons, employees, and caretakers.

Thanks for the opportunity to share my thoughts. I'm energized by this project and truly think it has potential to be not only additive but critically vital to the growth of our city with a very forward thinking approach that meets the needs of our community and this organization's short term and long term goals.

Public Utilities: Comments provided by Kristeen Beitel

Public Utility conditions for rezone and text amendments include offsite water, sewer, and stormwater quality improvements. The increased demand will require the replacement of water mains in State Street, 500 South, Main Street and 700 South. Offsite sewer system must be evaluated, and upgrades will be required as determined by demands and system modeling. The project site drains directly to the storm drain system that connects to the Jordan River, approximately 1.6 miles to the west. Stormwater quality will be very important during construction and for future long-term maintenance. These improvements will be required as part of the building permit for future buildings.

Comments regarding future development:

Any and all future development at this site, regardless of zoning classification, must meet all Salt Lake City Public Utilities requirements.

The following comments have been provided to assist in the future development of the property and are provided for information only and do not provide official project review or approval. Comments are provided to assist in design and development by providing guidance for project requirements.

- Public Utility permit, connection, survey, and inspection fees will apply.
- All utility design and construction must comply with APWA Standards and SLCPU Standard Practices.
- All utilities must meet horizontal and vertical clearance requirements. Water and sewer lines require 10 ft minimum horizontal separation and 18” minimum vertical separation. Sewer must maintain 5 ft minimum horizontal separation and 12” vertical separation from any non-water utilities. Water must maintain 3 ft minimum horizontal separation and 12” vertical separation from any non-sewer utilities.
- Public street lighting upgrades may be required during building permit application review.
- Utilities cannot cross property lines without appropriate easements and agreements between property owners.
- Parcels must be consolidated or a revised plat completed prior to permitting.
- Site utility and grading plans will be required for building permit review. Site utility plans should include all existing and proposed utilities, including water, irrigation, fire, sewer, stormwater, street lighting, power, gas, and communications. Grading plans should include arrows directing stormwater away from neighboring property. Please refer to APWA, SLCDPU Standard Practices, and the SLC Design Process Guide (<http://www.slcdocs.com/utilities/PDF%20Files/SLC%20Design%20Process%20Manual.pdf>) for utility design requirements. Other plans such as erosion control plans and plumbing plans may also be required, depending on the scope of work. Submit supporting documents and calculations along with the plans.
- Applicant must provide fire flow, culinary water, and sewer demand calculations to SLCDPU for review. The public sewer and water system will be modeled with these demands. If the water demand is not adequately delivered by the existing mains, then a water main upsizing will be required at the property owner’s expense. The expected maximum daily flow (gpd) from the development will be modeled to determine the impacts on the public sewer system. If one or more sewer lines reaches of the sewer system reach capacity as a result of the development,

sewer main upsizing will be required at the property owner's expense. Required improvements on the public water and sewer system will be determined by the Development Review Engineer and may be downstream of the proposed development. A plan and profile of the new main(s) and engineer's cost estimate must be submitted for review. Design drawings and cost estimate must be stamped and signed by a professional engineer. The property owner is required to bond for the amount of the approved cost estimate.

- Fire hydrants must be connected to mains 8" or larger. If any new fire hydrants are required, water main upsizes will be required for water mains that do not meet this standard. Minimum water main size is 12" for this commercial area.

- One culinary water meter is permitted per parcel and fire services, as required, will be permitted for the property. If the parcel is larger than 0.5 acres, a separate irrigation meter is also permitted. Each service must have a separate tap to the main.

- All food and beverage processing, preparation, and service requires grease removal prior to discharge to the public sewer system. Treatment must be provided such that the discharge limit of 500 mg/L of FOG (fats, oils, and grease) is achieved. Plans must show a treatment device and provide a plan for treatment and sampling that meets this discharge limit and all applicable standards set forth in the Utah plumbing code and SLCDPU Standards. Treatment device shall be located as to be readily accessible for cleaning and inspection. The treatment device must be sized by a licensed design professional. For an exterior, below grade device, a 4 foot diameter sampling manhole, per APWA 411, must be located downstream of the interceptor and upstream of any other connections. For alternative treatment methods, a sampling point must be provided immediately downstream of the device and upstream of any other connections. Include the treatment device, sampling location, and all associated piping on the submitted plans. Plumbing plans must show two separate waste streams - one for grease and one for sewer.

- Covered parking area drains and work shop area drains are required to be treated to remove solids and oils prior to discharge to the sanitary sewer. These drains cannot be discharged to the storm drain. Use a sand/oil separator or similar device. A 4ft diameter sampling manhole must be located downstream of the device and upstream of any other connections.

- Site stormwater must be collected on site and routed to the public storm drain system. Stormwater cannot discharge across property lines or public sidewalks.

- Stormwater treatment is required prior to discharge to the public storm drain. Utilize stormwater Best Management Practices (BMP's) to remove solids and oils. Green Infrastructure should be used whenever possible. Green Infrastructure and LID treatment of stormwater is a design requirement and required by the Salt Lake City UPDES permit for Municipal Separate Storm Sewer System (MS4). This permit was updated with this requirement in June 2021. The applicant will need to provide options for stormwater treatment and retention for the 80th percentile storm. If additional property is not available, there are other options such as green roof or other BMP's. Lack of room or cost is generally not an exception for this requirement. If green infrastructure is not used, then applicant must provide documentation of what green infrastructure measures were considered and why these were not deemed feasible. Please verify that plans include appropriate treatment measures. Please visit the following websites for guidance with Low Impact Development: <https://deq.utah.gov/water-quality/low-impact-development?form=MY01SV&OCID=MY01SV> and <https://documents.deq.utah.gov/water-quality/stormwater/updes/DWQ-2019-000161.pdf?form=MY01SV&OCID=MY01SV>.

- Stormwater detention is required for this project. The allowable release rate is 0.2 cfs per acre. Detention must be sized using the 100-year 3-hour design storm using the farmer

Fletcher rainfall distribution. Provide a complete Technical Drainage Study including all calculations, figures, model output, certification, summary, and discussion.

- Projects larger than one acre require that a Stormwater Pollution Prevention Plan (SWPPP) and Technical Drainage Study are submitted for review.

Building: Comments provided by Heather Gilcrease

Building Services will have no comments during this phase of the development process.

Engineering: Comments provided by Scott Weiler

No objections.

Housing Stability: Comments provided by Tony Milner

Since this rezone and text amendment application for the Sears Site does not propose the removal of existing residential units or propose the creation of new residential units, the Housing Stability Division has no comments on this application.

Public Services: Comments provided by Jorge Chamorro

No comments or concerns from Public Services Operations.

Police: Comments provided by LT Andrew Cluff

No problems with the proposed request so long as police are included when there is a proposed plan for development.

Transportation: Comments provided by Jean Carver

Transportation has no issues with the proposed rezone and text amendment. Traffic Impact Study will be required with subsequent development application(s).