To: Salt Lake City Planning Commission  
From: Katilynn Harris, Principal Planner, katilynn.harris@slcgov.com, 801-535-6179  
Date: June 28, 2023  
Re: PLNPCM2023-00018 & PNPCM2023-00019, The Silos

**Planned Development & Design Review**

**PROPERTY ADDRESS:** 522 S, 554 S, and 568 S 400 W, & 424 W, 426 W, 440 W and 470 W 600 S  
**MASTER PLAN:** Downtown Plan  
**ZONING DISTRICT:** General Commercial

**REQUEST:**

Keith Smith, representing the property owners, has applied to the city for approval of Planned Development and Design Review petitions for 2 buildings within a mixed-use development located at approximately 568 S 400 W. The proposed development consists of a multi-family building containing studio, 1-, and 2-bedroom units and a mixed-use building containing ground floor commercial units with studio and 2-bedroom apartments on the upper floors. The site includes 7 existing parcels that will be consolidated into 4 parcels for a total of 5.5 acres. The subject property is located within the General Commercial (CG) district.

**Design Review:** The maximum building height in the CG zone is 60 feet by-right and up to 90 feet with Design Review approval. The applicant is requesting approval for approximately 85 and 83 feet of building height for each building.

**Planned Development:**

- a lot and associated building without public street frontage,
- reduction of the corner side yard (along 600 S) from 10 feet to 0 feet,
- a public street facing façade (along 600 S) without a building entrance, and
- upper-level decks and ground floor awnings projecting into a required front yard setback (along 400 W).

**RECOMMENDATION:**

Based on the information and findings listed in the staff report, it is the Planning Staff's opinion that the request generally meets the applicable standards of approval and therefore recommends the Planning Commission approve the request with the following conditions:
1. Prior to issuance of a permit for project construction, the applicant shall record a development agreement establishing the two midblock walkways throughout the block; one running north/south to connect 500/600 South and one running east/west to connect 400/500 West.

2. Final approval of the details for lighting, hardscape and pedestrian elements of the midblock walkways, and screening of ground mounted utility boxes to be delegated to Planning staff to verify compliance with the associated Planned Development and Design Review Standards.

ATTACHMENTS:

A. ATTACHMENT A: Vicinity Maps
B. ATTACHMENT B: Design Review Project Narrative
C. ATTACHMENT C: Planned Development Project Narrative
D. ATTACHMENT D: Plan Set
E. ATTACHMENT E: Property Photos
F. ATTACHMENT F: CG Zoning Standards
G. ATTACHMENT G: Design Review and Planned Development Standards
H. ATTACHMENT H: Public Process & Comments
I. ATTACHMENT I: Department Review Comments

PROJECT DESCRIPTION

Background

This proposal is phase 1 of the redevelopment of the block bounded by 500 and 600 South and 400 and 500 West. Phase 1 will consist of 2 new buildings, a mixed-use building and multi-family building, and 2 existing buildings that will be retrofitted into a parking garage and retail space. Phases 2 and 3 will consist of affordable housing, commercial spaces, a hotel, pickleball courts, and a park. Although phase 2 and 3 are future projects and not part of the modifications being requested with this application, the entire block concept and some information about future phases has been provided to help provide the “big picture” context for the commission.

This application is for the design review and planned development of the two new buildings in phase 1. See the map below for context.
Project Details

Phase 1 is comprised of two parts: (1) the construction of two new buildings and two interior streets/midblock walkways and (2) the redesign of two existing buildings and surface parking lot.

There are several existing buildings on site. Six buildings will be demolished to accommodate the midblock walkways and Buildings 1 and 2 while two buildings on the southwest corner of the lot along 600 South should remain. The Miller Building on the corner of 500 West and 600 South is a one-story brick warehouse. This building will be remodeled into a secure, covered parking garage. North of the Miller Building is an existing concrete pad that will be reconfigured into a surface parking lot. Both the Miller Building and the surface parking lot will provide some of the required parking for Buildings 1 and 2. Just east of the Miller warehouse is the 2-story, red brick Casket Building. The applicant intends to restore this structure and retrofit it to provide additional retail space for the site.

The surface parking lot, Miller Building, and Casket Building do not require any modifications to the zoning code and will meet all applicable zoning regulations.

The aspects of phase 1 that are subject to the design review and planned development standards are Buildings 1 and 2 as well as the midblock walkways identified in the Downtown Master plan that cross the associated lots.

Building 1

<table>
<thead>
<tr>
<th>Building 1 Quick Facts</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Height:</strong> 83 feet (6 stories)</td>
</tr>
<tr>
<td><strong>Number of Residential Units:</strong> 65</td>
</tr>
<tr>
<td>- 40 studio units</td>
</tr>
<tr>
<td>- 25 2-bedroom units</td>
</tr>
<tr>
<td><strong>Ground Floor Uses:</strong></td>
</tr>
<tr>
<td>- 6,740 SF commercial space</td>
</tr>
<tr>
<td>- Outdoor dining/patios</td>
</tr>
<tr>
<td>- Garbage/recycling</td>
</tr>
<tr>
<td>- Entrance lobby</td>
</tr>
<tr>
<td><strong>Parking:</strong> Provided in the off-site parking area.</td>
</tr>
</tbody>
</table>
Building 1 is a mixed-use building in the middle of the block that fronts onto the future park. It is accessed via the private streets/midblock walkways running through the block. The ground floor includes the residential lobby and 4 commercial spaces.

**Building 2**

Building 2 is a multi-family building with frontage on 400 West and 600 South. It is also bounded on the north and west by the two midblock walkways. The east, west, and south ground floor uses are primarily residential units and lobbies. The ground floor use along the north side of the building are amenity and leasing office spaces. The central portion of the building is a parking garage and other services for residents including garbage/recycling and bicycle parking.

**Midblock Walkways**

The Downtown Master Plan identifies two midblock walkways on this block; one running north/south to connect 500/600 South and one running east/west to connect 400/500 West. This project will provide both midblock walkways via the two interior private streets that are north and west of Building 2. The north/south midblock walkway will also continue north between Building 1 and the future park.

While the north and west portions of the midblock walkways are not included in this phase of development, the applicant will be including those future phases on the midblock walkway easement that is a condition of approval for this project to ensure the walkways will be continued through the entire block.
Requested Modifications

The applicant is requesting the following modifications through the design review and planned development processes. See Attachment G for a complete analysis of the design review and planned development standards.

**Building 1**

**Design Review:** In the CG zone, 60’ of building height is permitted by right with an additional 30’ permitted through the design review process for a maximum building height of 90’. This building is proposed to have a height of 83’ to accommodate an additional level and enhanced roofline.

**Planned Development:** This building and its associated lot are essentially landlocked, meaning they do not have frontage along a public street as required by code. This, and by extension any standard relating to the building’s relationship to a public street, requires modification through the planned development process.

**Building 2**

**Design Review:** Building 2 also requires design review for additional building height as it has a proposed height of 85’. This extra height will add an additional floor of residential units and provide ample space for a unique roofline.

**Planned Development:** The applicant is requesting several modifications to zoning standards to construct this building as proposed, all of which will be reviewed through the planned development process.

1. Reduce the required corner side yard setback along 600 South from 10’ to 0’ to match the setbacks of the Miller and Casket Buildings.

2. The 600 South façade will also not have any building entrances. At least one building entrance is required for every public street facing façade in the CG zoning district. The ground floor uses along this façade are three residential units and a parking garage. The residential unit entrances are oriented to 400 West and the private drive/midblock walkway.

3. There are several ground floor awnings and upper-level decks that will project into the 10’ front yard along 400 West. These types of projections are not permitted to encroach into a required front yard in the CG zone.
APPROVAL PROCESS AND COMMISSION AUTHORITY

Per section 21A.55.030 of the Zoning Ordinance, the Planning Commission may approve a Planned Development as proposed or may impose conditions necessary or appropriate for the Planned Development to comply with the standards. The Planning Commission may deny an application for a Planned Development if it finds that the proposal does not meet the intent of the base zoning district (CG General Commercial), does not meet the purpose of a Planned Development, or is not consistent with the standards and factors as set forth in section 21A.55.

Per section 21A.59.030 of the Zoning Ordinance, the Planning Commission shall approve a Design Review if it finds that the proposal complies with the purpose of the zoning district and applicable overlay district(s), the purpose of the individual design standards that are applicable to the project, and the project is compliant with the design review objectives. The Commission may also add conditions or modifications.

KEY CONSIDERATIONS

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

1. Implementation of City Goals and Policies
2. Requested Modifications and Design Review and Planned Development Standards
Consideration 1: Implementation of City Goals and Policies

The proposal offers much in the way of an opportunity to implement several goals identified in the Downtown Master Plan.

The project is within the “Grand Boulevards” plan area designated by the Downtown Master Plan. The first sentence of the Grand Boulevards plan states that it’s “a major point of arrival to the downtown by car and is suitably designed to welcome and excite visitors.” The proposal is architecturally cohesive and designed to welcome and engage visitors. It is also designed “to transition vehicles from highway speeds to an integrated, urban environment.” Additionally, the “mid-rise buildings that shape the street edge” contribute to this unique hybrid environment. The Grand Boulevards plan also calls for “unsightly elements, such as large power lines and billboards, [to be] relocated, consolidated or enhanced.” The applicant states that existing billboards will be removed, achieving a key element of the Grand Boulevards plan.

Another aim of the Grand Boulevards Community Plan is to “provide residential, innovation and research development, and additional office development in an urban development pattern...” as well as fostering “innovation... collaboration and entrepreneurship... [and] A diverse range of companies in various sectors.” The proposal intends to provide a variety of housing options and retail spaces to attract and serve those who will be employed by the surrounding office, industrial, and other commercial uses in the vicinity.

Consideration 2: Requested Modifications and Design Review and Planned Development Standards

Building 1

Building 1 has a modern design with a distinct roof line and a brick façade with wood accent details. This building is oriented toward the future park and as such will have no public street frontage but is accessible through the proposed interior streets which, as discussed previously, include the midblock walkways. The purpose of this configuration is to activate the park, which is a central feature of the overall development, through the ground floor retail and outdoor patio spaces that open onto it from this building. This orientation will also provide easy access to the park for the future residents of the building.

As part of the additional height request (83 feet rather than the permitted 60 feet), the CG zone requires increased landscaping over and above that which is normally required. The amount of increased landscaping shall be equal to ten percent (10%) of the area of the additional floors. For Building 1, the additional floor area is 10,590 square feet, therefore the lot must include at least 1,059 square feet of landscaping in addition to what is already required. For this property, a required landscaped front yard is identified along the southern portion of the building. In addition to the front yard landscaping, the applicant is proposing to provide 2,476 square feet of additional landscaping on the north and east property lines contiguous to the future park. This exceeds the 1,059 square feet of additional landscaping that is required to offset the additional building height.

The building height also results in an improved site layout by providing additional floor area to increase the number of residential units to support both the commercial space on the ground floor and the adjacent park. By building up rather than out, the site is able to accommodate more open space and outdoor dining to activate the property at the ground level.

The additional height does not cause any negative impacts and is well designed for human scale. The building height is modified through a base, middle, and top design which is expressed through a unique
roofline and a combination of fenestrations and columns that are found only on the ground floor. It includes a distinct ground floor base with retail spaces utilizing storefront windows, inset entrances, and distinct wood accent detailing that delineates the base while relating it to the human scale. The base also includes an elevated patio area to accommodate outdoor dining that provides a transition into the adjacent park.

While the building mass isn’t particularly large, the modulation of the roof line carries down through the front façade which reduces the visual impact of the additional height. The residential unit balconies serve to further divide up the building mass while also contributing to the pedestrian scale and visual interest. Additionally, this façade will have glass at all levels and includes retail uses along the full length of the building to facilitate pedestrian interaction.

**Building 1**

This building has a more modern, angular shape with street frontage on all sides; 400 West and 600 South as well as both private interior streets which double as the midblock walkways. Each façade features a different overall shape and mixture of materials and finishes to reduce the visual impact of the building and increase pedestrian interest.

Building 2 includes 45,112 square feet of additional floor area created by the extra building height (85 feet rather than the permitted 60 feet). As such, the site must include at least 4,511 square feet of landscaping in addition to the minimum required by the zoning ordinance. This property is required to provide a landscaped yard for both the corner side yard along 600 South and the front yard along 400 West. The 10’ front yard will be fully landscaped in accordance with the standards for landscaped yards in 21A.48.090. While the reduced building setback from 600 South eliminates much of the area for the landscaped yard along that façade, the limited space between the building and public sidewalk along 600 South will be fully landscaped. The applicant is proposing to provide the displaced corner side yard landscaping and additional landscaping required by the additional building height in various locations throughout the property. These include planting areas beneath the street trees lining the private streets/midblock walkways and outside the residential unit entrances accessed via the midblock walkway. There is also additional landscaping in the northeast corner of the property along 400 West where the building angles away from the street to create more open space. This additional landscaping equals 5,140 square feet. The applicant also indicates there will be planting areas within the outdoor
amenity spaces, such as the pool deck and central plaza, but as the final layout of those areas have not been finalized, those landscaping areas were not included in these calculations.

The additional building height provides increased square footage which increases the space for amenities throughout the building; especially outdoor open spaces such as the pool deck and central plaza. It also results in an improved site layout by increasing the space available for the midblock walkways. By building up rather than out, this property can accommodate two interior streets that double as midblock walkways. This increases the overall circulation and public access through the block which in turn improves the pedestrian experience.

Each façade of Building 2 features a distinct design and architecture which will be discussed individually below.

**East Façade:** The east façade along 400 West is 295' long. This façade is broken up into two distinct and separate building masses by a central 2nd level plaza. This modulation is designed to read as two separate buildings as they are not connected above the ground floor. The northern portion of the façade angles inward away from the sidewalk which lessens the visual impact of the building’s height on the public right-of-way. The southern portion of this façade is separated into two sections delineated by height, roofline, fenestrations, and building materials. Additionally, the protruding balconies and breaks in the building create articulations to further break up the façade’s massing.

Due to the setback of this portion of the building, some of these projections encroach into the required front yard; the ground floor canopies project 4’ from the building while the upper-floor balconies project 4’-3”. These projections are designed to add depth and visual interest to the façade while also contributing to an improved pedestrian experience and scale along 400 West.

The building height is further modified through the base, middle, and top design where the base is distinguished by different building materials, multiple building entrances, patio coverings, and window design. The ground floor will have 8 residential units opening directly onto 400 West as well as two building entries to access the apartments above. Each entrance is covered by a canopy which adds to the pedestrian scale of the structure. The top features a classic A-frame roof that creates a unique shape for this size of building where roofs are traditionally flat while also lowering the overall appearance of the height of the building. The two main sections use a repetition of building materials, fenestration, and balcony design to create a cohesive building body.
South Façade: This façade along 600 South is 190’ in length. While the design on this façade is simpler than the rest of the building due to its proximity to the I-15 off-ramp, it still employs a variety of methods to add visual interest. The roofline features a sawtooth design which is carried down through the ground floor to create vertical modulations to the façade. This articulation creates seven distinct building sections that break up the façade and contributes to the visual interest. The proposed brick for this façade includes texture and detailing that is not found in a common flat brick which will add to the pedestrian experience.

The base, middle, and top are defined mostly through variations in the fenestrations of the windows. The ground floor features large, wide windows into the residential units on that floor while the middle uses a repeating pattern of windows and Juliet-balcony doors to create a different visual aesthetic.

This façade requires two modifications through the Planned Development to be constructed as proposed: a reduced setback and no entrances along a public street.

The purpose of the reduced setback is so the building can match the setbacks of the Miller and Casket buildings to the west and the development pattern to the east. This will significantly contribute to establishing a defined street edge as called for in the Downtown Master Plan.

While there is no building entrance proposed along 600 South, there are several windows into the residential units along this façade to provide eyes on the street. The decision to orient the building and unit entrances away from this façade was driven by the unique conditions along this specific stretch of 600 South. At this point, cars exiting off I-15 are still decelerating from highway speeds making this section of the road more oriented toward cars rather than pedestrians. The applicant elected to orient the pedestrian features of the building toward the side streets, which are naturally more pedestrian focused. The 600 South façade is designed to help transition 600 South from car-centric development patterns to the pedestrian-centric patterns further east while still creating the pedestrian experience along the subject block.
**West Façade:** This façade is also 295’ and frames one side of the proposed north/south midblock walkway. The massing of this side of the building is broken up using a variety of methods. The north end of the building is dominated by a 4,000 square foot second level pool deck that significantly steps the building back and substantially reduces the massing on that end of the structure. The remaining bulk of the upper-level façade is separated into three sections. The north and south portions symmetrically frame the central section which is designed to look like a separate building. Features including different building materials, fenestration patterns, and rooflines combined with vertical breaks and modulations contribute to the visual appearance of three separate buildings. The central portion of the 6th floor includes a continuous balcony that wraps that section of the façade that adds to the visual interest of the building. The height and angles of the roofline vary which lowers the perceived building height.

The building height is further modified through a distinct base, middle, and top design. The middle employs a traditional fenestration pattern while the top is separated by the balcony and a material change to corrugate metal. The base of this façade is separated into two visual themes: residential and amenity. The southern half of the ground floor utilizes the same design and visual cues as the east side of the building which is also dedicated to residential uses. The northern half includes double entry doors, storefront windows, and clerestory windows to provide increased visibility and interaction between the midblock walkway and the amenity space, lobby, and leasing office inside. The ground floor parking garage is limited to a single access point off the midblock walkway which reduces pedestrian/vehicle conflict points.

**North Façade:** The north façade is 161’ in length and is dominated by the second level pool deck which is approximately 4,000 square feet. Approximately 2/3 of the upper levels are stepped back from the midblock walkway to accommodate the pool deck which reduces the impact the height of the building on both the walkway and the park to the north. This portion of the façade features a similar sawtooth design as found on the south façade, but it is contained to the roofline allowing the façade to be angled, but largely flat.

The northeast portion of the façade features a traditional fenestration pattern and a 6th floor deck and enclosed amenity space that operates much like a rooftop deck. This deck overlooks the pool, midblock walkway, and park which increases the visual interaction between the tenants of the building and the public at street level.

The ground floor uses are a large amenity space and a residential unit. The door and window design of the amenity space wraps around from the west façade and provides ample glazing to provide pedestrian interaction with the building at the ground floor.
Midblock Walkways

As discussed previously, The Downtown Master Plan identifies two midblock walkways on this block. These will run through this project following the two private streets and between Building 1 and the future park. The midblock walkways/private streets provide access to Building 1 and increase ground floor access to Building 2. The two midblock walkways will operate similarly to publicly owned streets with 6’ wide sidewalks and street trees on either side of a roadway which increases the space available for public use. This site design increases both pedestrian and vehicular circulation through a large city block and further enhances the pedestrian experience.

In addition to the sidewalks and street trees, which increase pedestrian safety, the applicant is proposing street lighting throughout the midblock walkways that will also lend to the safety of these walkways. The applicant is also proposing public art, seating, seasonal shade, and outdoor dining within the walkways as required by Standard F of the Design Review.
Summary

A variety of zoning districts within the city require ground floor activation, pedestrian oriented development, and enhanced material and building design through Chapter 21A.37 of the Zoning Ordinance. Currently, the only design standards required in the CG zoning district are surface parking lot lighting and at least one building entrance on street facing facades. Additionally, there are not currently any design standards for the midblock walkways in this zoning district. The standards required by the Design Review and Planned Development are much more comprehensive than the CG zone itself. As such, the project proposed far exceeds the minimum standards required by the base zoning district.

NEXT STEPS

Approval of the Requests

If the petitions are approved by the Planning Commission, the applicant will need to comply with the conditions of approval, including any of the conditions required by City departments and the Planning Commission. Unless specified in the zoning ordinance as a minor modification, any modification to the development plan must be reviewed and approved by the Planning Commission.

Denial of the Requests

If the petitions are denied, the applicant could still develop the site, but the development would have to be modified to meet all zoning regulations. The City Council adopted the Downtown Building Heights ordinance and that will go into effect once the ordinance is published. The adopted changes permit building heights in the CG zone up to 150’ in a certain area of the city between 400 & 700 S and 300 W & I-15 (this project is located within that area). Additionally, with these adopted changes, projects in the CG zone will be subject to several design standards that are not currently applicable to the CG zone.
ATTACHMENT A: Vicinity Maps

Project block context
ATTACHMENT B: Design Review Project Narrative

Planning Division
451 S State Street, Room 406
Salt Lake City, UT 84111

Subject: Design Review, Silo Park Apartments

Submittal Requirements

1. Project Description

BCG Holdings, Lowe Property Group and Catalyst have partnered to redevelop the majority of the block bordered by 400 and 500 West and 500 and 600 South in downtown Salt Lake City, with the north half of the block introducing an adaptive reuse hotel offering food and beverage, an affordable housing development, a pickleball retail concept, a central park area and various retail spaces. The southern half of the block will house an innovative Class-A apartment development and parking. Similar to Post District, (located on the neighboring block to the east) which was planned and is being developed by BCG and Lowe Property Group, Silo Park will be a best-in-class mixed-use urban neighborhood with walkable streets connecting hotel, retail and housing in a complete neighborhood all centered on a central park. BCG and Lowe Property Group would love to host city staff and planning commission members on a tour of Post District.

This application represents the first phase of a larger block development and is approximately 5.5 acres which will consist of four parcels (Lots 1, 2, 3, & 5 as shown on sheet CSP-1) and will house two apartment buildings that, will provide a mix of residential, corporate housing and hospitality uses (Buildings 1 & 3), as shown in the image below in light blue. The mix between long-term rentals, corporate housing rentals and hospitality suites is intended to be flexible as dictated by the market over time. These two buildings will collectively include approximately 286 residential units and approximately 6,750 square feet of retail. It will also include an adaptive reuse of two existing buildings (Miller and Casket, Lots 2 & 5).
Phase 1

The main purpose for submitting the attached Design Review application is due to two of the buildings (Buildings 1 & 3 on Lots 1 & 3) within our first phase of development exceeding the maximum height limits of 60 feet, as set forth in 21A.26.70 of the CG General Commercial District. Please see the image below. We are seeking a modification to allow additional height through the Design Review process. In anticipation of the Design Review process, we have designed additional landscaping within the first phase by more than 10% of the area of the additional floors within each respective lot, per 21A.26.070.F.2.
We intend to promote a walkable environment, curate spaces that are captivating and comfortable, and promote the City’s master plans.

Building 1 will be 5 stories of Type IIIA construction over one level of Type IA. This building will have a bold new design that will house approximately 65 units with a range of sizes. A greater description of number, size and type of units is provided within the Project Data sheet on page A0-1 within the architectural sheets. On the ground level of building 1, approximately 6,750 square feet of retail space is planned and oriented toward the central park, which is just east of this building. This will create active use and visual interest on the main floor.
Building 3 is the largest building and will consist of approximately 221 units within 5 levels of Type IIIA over one level of Type IA podium. These units will have a range of studios, 1-bedroom units, and 2-bedroom units (see sheet A0-1 for more specifics on quantity, size, and schematic layout of units). All amenity spaces for all three buildings will reside here and will feature views that overlook the central park and the old iconic silos, namely a resort-style pool deck, an oversized gym, and a rooftop clubroom and perch. Building 3 will also contain approximately 68 parking spaces on the main floor.

The Miller Building will be adapted to house indoor parking for the residents and the parking lot north of the Miller Building will park residents and retail patrons. The Casket Building will be repurposed to a retail or commercial use, dictated by the market.

Central to this development is a large urban park that will be an amenity unlike any other within Salt Lake City. This park will be an open space that offers community gathering and relief to the surrounding built environment. Residents, patrons, and guests will be able to interact with the park that will abut the old silos and enjoy the diverse programs that will ensue.

2. Minimum Plan Requirements
   - Please see attached architectural sheets for plan and elevation drawings

3. Site Plan
   - Please see attached architectural sheets for site plans

4. Elevation Drawing
   - Please see attached architectural sheet for elevation, sections, and profiles

5. Additional Requirements

21A.58.060: Application Requirements:

A. The applicant’s name, address, and telephone number are clearly marked on each sheet of the architectural drawings.

B. The owner’s contact information for Building 3 is clearly marked on each architectural sheet. The owner of Building 1 is:
   Olympus QOZB, LLC
   386 West 500 South
   Salt Lake City, UT 84101
   (214) 235-8778

C. The street addresses and tax parcel numbers for buildings 1 and 3 are the following:

D. The zoning classification for this entire block is CG. An in-depth review of the zone can be found in the next section below. The present use of the subject property is light manufacturing, retail, warehousing, storage, and general commercial.

E. Zoning Classification can be seen on sheet A0-1 and A0-2.

F. The proposed title of the project will be Silo Park Apartments.

G. See boundaries on the attached architectural sheets.

H. See attached survey, Sheets SVY-1 & SVY-2

I. See attached Conceptual Utility Plan, Sheet CUP-1

J. See attached Conceptual Utility Plan and Conceptual Site Plan, Sheet CUP-1 and CSP-1

K. Please see attached architectural sheets.

L. Please see attached architectural sheets.

M. Signage will be in accordance with City standards.

N. Please see the attached landscape sheet, L101

O. The location of dumpsters and all trash receptacles will be internal to the building footprint.

P. Please see the attached landscape sheet, L101 for more detail on the park area.

Q. Please see Project Data sheet, within the architectural sheets, A0-1

R. Please refer to Project Data sheet, A0-1

S. Please refer to Project Data sheet, A0-1

T. See landscape sheet within architectural sheets, L101

Zoning – General Commercial District (CG Zone) Purpose Statement and Design Standards

Per Section 21A.26.070 of the zoning code, the CG Zone’s purpose is to provide "...economic development opportunities through a mix of land uses, including retail sales and services, entertainment, office, residential, heavy commercial and low intensities of manufacturing and warehouse uses. This district is appropriate in locations where supported by applicable master plans and along major arterials. Safe, convenient, and inviting connections that provide access to businesses from public sidewalks, bike paths and streets are necessary. Access should follow a hierarchy that places the pedestrian first, bicycle second and automobile third. The standards are intended to create a safe and aesthetically pleasing commercial environment for all users."

All residential buildings within this area lie within the CG Zone. Historically, apartments and hospitality suites have not been introduced into this particular area of the city, so introducing either will add to the much-needed housing and hospitality offerings in this part of the city. These buildings will support “economic development opportunity” for the city by providing a large
quantity of high-quality units where individuals will shop, dine, work, and play. Retail space will be included in the lower floor of Building 1 that will assist in inviting pedestrians into the heart of the project. The park will welcome and accommodate spill over from the retail areas and further engage pedestrian interest.

As part of the greater block development, the existing buildings surrounding the area are planned to receive major improvements and renovations, creating high-quality commercial and retail spaces. In concert with the apartments, these other mixes of uses will make this block a true mixed-use development that will contribute to “a safe and aesthetically pleasing commercial environment.”

New roads and walking paths will be created to allow for greater connectivity through the block that has largely been fenced off and restricted in years past. Pedestrians and bikes will be prioritized.

Per Section 21A.26.070, Buildings 1, 2, & 3 adhere to the CG zoning standards as follows:

A. **Purpose Statement** – This is explained above.
B. **Uses** – This project adheres to the various allowable uses as set forth in Section 21A.33.030 and all uses are permitted.
C. **Minimum Lot Size** – All lot sizes are greater than 10,000 SF and has a width greater than 60’.
D. **Minimum Yard Requirements** – See attached architectural sheets A0-3, A3-1, A3-2, and A3-3. Building 1 meets all yard requirements, however, building 3 does not meet the 10’ side yard requirement so we are also submitting a Planned Development application for consideration on this requirement.
E. **Landscape Yard Requirements** – See the attached architectural sheets referenced above. We will conform to the requirements of section 21A.48.090
F. **Maximum Height**: Only buildings 1 and 3 are greater than the allowable 60’ height and is the reason for the Design Review process. We are following the provisions of F1, F2, and F3.

**Grand Boulevards Community Plan**

Since the Silo Park Apartments are located between 500 and 600 South, the entire project lies within the “Grand Boulevards” community district. The owner/developers who reside in Salt Lake City and have vested interest in the long-term success of the city. Silo Park has been carefully designed to closely align with the Grand Boulevards community vision.
The first sentence of the Grand Boulevards vision states that it’s “a major point of arrival to the downtown by car and is suitably designed to welcome and excite visitors.” The Silo Park Apartments will “welcome and excite visitors” by providing state of the art architecture from an award-winning architectural firm. “Mid-rise buildings, large street trees, and iconic lighting” will be used to create a unique “urban environment.” The Grand Boulevards plan also calls for “unsightly elements, such as large power lines and billboards, [to be] relocated, consolidated or enhanced.” As part of the development in this area, we plan on removing a billboard that is located along 600 south and burying the powerlines along 500 South to further enhance the area.

Another aim of the Grand Boulevards Community Plan is to “provide residential, innovation and research development, and additional office development in an urban development pattern…” as well as fostering “innovation... collaboration and entrepreneurship... [and] A diverse range of companies in various sectors.” As mentioned above, the Silo Park Apartments will provide a variety of housing options and retail spaces to attract and serve those who will be employed by the many other office, co-working, retail, and other commercial uses of the larger block development. In total, the larger Silo Park block will provide a mix of office, retail, and residential spaces.

### Standards for Design Review (21A.59.050)

Per Section 21A.59.050 of the zoning code, the Silo Park Apartments project must “demonstrate how the proposed project complies with each standard for design review.” Below is an outline of how this project will comply with each design review standard:

A. As explained above, the project complies with the intent of the CG zoning district purpose statement. It also incorporates the intent of the Grand Boulevard Community Plan.

B. All sides of buildings 1 and 3 that can be, are oriented toward public sidewalks. Many units on the lower floors of each of these buildings have entrances and stoops off the sidewalks.
   1. All units on the main floor of Building 3 are oriented toward 400 West and the new private western street. These units have entrances along the public sidewalks. Building 1 will have spectacular views of the large interior park.
   2. Buildings 1 and 3 are located close to public sidewalks, creating a pedestrian-oriented development.

C. Buildings 1 & 3 have sufficient quantities of detailing and glass to facilitate pedestrian interest and interaction.
   1. The main floor of Building 1 is mainly retail and will have a large amount of glass to showcase the retail tenants. The northeastern exterior walls of Building 3 will largely be glass to display the leasing office and amenities.
2. As much as possible, Buildings 1 and 3 will maximize transparency of the ground floor lobby to pedestrians.
3. Sign bands, articulation, and architectural detail will be used at the ground floor level to attract attention from passersby.
4. The pool/amenity deck in Building 3 will have a direct view of the central park and outdoor spaces. The orientation of Building 1 and the retail of Building 1 is clearly meant to interact with the park/open space to the east. We envision retail patrons utilizing the park/open space.

D. Glazing, fenestration relief, material changes, and landscaping patterns (hard and softscape) provide a pedestrian emphasized ground floor.
   1. Building scale, massing, and vertical emphasis has been carefully coordinated with existing and anticipated buildings to improve the aesthetic of the city skyline as well as the pedestrian experience.
   2. The project’s award-winning architect created a thoughtful balance of vertical and horizontal emphasis throughout the entirety of the project. Exterior building material colors will be determined later through product samples.
   3. Secondary elements have been tastefully incorporated into the building’s design, maintaining a fair balance between modern and historical design.
   4. The building’s scale and solid-to-void ratio of windows and doors is appropriate for the area. Windows have intentionally been placed throughout the building’s façade to increase the visual pattern and appeal of the façade.

E. Building 1 does not have a façade that exceeds 200’. Building 3 has incorporated changes in vertical plane breaks, material changes, and massing changes.

F. The project will include the following elements in its’ privately-owned public spaces:
   1. Ownership plans to provide a variety of areas with seasonal shade.
   2. Throughout the larger Silo Park Apartments project, there will be several instances of public art.
   3. Throughout the larger Silo Park Apartments project, there will be several outdoor dining areas for the various retail locations. Building 1 will have retail space on the main floor and an outdoor dining patio.

G. As mentioned above, the Silos Park Apartment buildings have been carefully designed and coordinated to create a distinctive City skyline with a positive relation to human scale.
   1. Building 3 has been designed with step-backs along the northern side to allow for the central park to feel more open and less confined. Building 3 also has incorporated material changes and other horizontal elements to provide scale and to relate well to each other and to other buildings in the area.
2. Negative impacts are reduced or eliminated by building modulation and varying of building massing thus creating ideal outdoor spaces for public activation and interaction. Please see the shadow analysis on sheet A0-5.

3. The architect has done a masterful job of creating a distinctive skyline for both buildings by incorporating unique sawtooth rooftops (Building 3), slopes (Building 1), decks and other rooftop elements.

H. Within the overall plan, we will be parking the majority of cars within the Miller Building and the adjacent parking lot. All interior street widths are meant to be as narrow as possible to reduce speed and encourage pedestrian interaction. The interior parking has been designed to make ingress and egress as safe and efficient as possible. Furthermore, pedestrian access between the parking areas, surrounding buildings, and the public sidewalk is clear and seamless. Parking has also been provided as required and appropriate for any combination of long-term and short-term parking.

I. Waste and recycling containers, mechanical equipment, storage areas, and loading docks will be removed from public view and located internal to the buildings as much as possible.

J. Commercial/wayfinding signage and lighting will be carefully coordinated with the building designs and surrounding landscaping, with emphasis on creating an unparalleled pedestrian experience.

K. The project’s lighting will create a comfortable and safe pedestrian environment in accordance with the Salt Lake City Lighting Master Plan. The lighting will be carefully designed to minimize its effects on surrounding properties and the sky.

L. The following streetscape improvements will be provided:
   1. One street tree for each 30’ of property street frontage, in accordance with the City’s urban forestry guidelines. Any trees removed will be replaced with additional trees approved by Urban Forestry.
   2. Hardscape will be utilized to differentiate privately-owned public spaces from other public spaces and will adhere to applicable design standards. Specifically, most of the privately-owned public spaces will incorporate upgraded materials such as pavers and concrete. Permitted materials for privately-owned public spaces shall meet the following standards:
      a. Use materials that are durable (withstand wear, pressure, damage), require a minimum of maintenance, and are easily repairable or replaceable should damage or defacement occur.
      b. Where practical, as in lower-traffic areas, use materials that allow rainwater to infiltrate into the ground and recharge the water table.
      c. Limit contribution to urban heat island effect by limiting use of dark materials and incorporating materials with a high Solar-Reflective Index (SRI).
d. Utilize materials and designs that have an identifiable relationship to the character of the site, the neighborhood, or Salt Lake City.

e. Use materials (like textured ground surfaces) and features (like ramps and seating at key resting points) to support access and comfort for people of all abilities.

f. Asphalt shall be limited to vehicle drive aisles. (Ord. 14-19, 2019)

As demonstrated above, the Silo Park Apartments seeks to create a pedestrian-friendly development that encourages a high level of community interaction and efficient modes of transportation to all residents. It’s our belief that we meet the intent of the design review standards and function as an integral piece of the greater redevelopment plan. We are confident that the design elements mentioned above, including the requested variances, will make Silo Park Apartments a project we all can be proud of.

Keith Smith

Vice-President
Lowe Property Group
Images of Existing Site

Overhead view of Silos block

View looking northwest from 600 South, at corner where Building 3 will be located.
View looking northeast from 600 south

View looking south, midblock where central park will be located
Views looking west from 400
ATTACHMENT C: Planned Development
Project Narrative

Planning Division
451 S State Street, Room 406
Salt Lake City, UT 84111

Subject: Design Review, Silo Park Apartments

Submittal Requirements

1. Project Description

BCG Holdings, Lowe Property Group and Catalyst have partnered to redevelop the majority of the block bordered by 400 and 500 West and 500 and 600 South in downtown Salt Lake City, with the north half of the block introducing an adaptive reuse hotel offering food and beverage, an affordable housing development, a pickleball retail concept, a central park area and various retail spaces. The southern half of the block will house an innovative Class-A apartment development and parking. Similar to Post District, (located on the neighboring block to the east) which was planned and is being developed by BCG and Lowe Property Group, Silo Park will be a best-in-class mixed-use urban neighborhood with walkable streets connecting hotel, retail and housing in a complete neighborhood all centered on a central park. BCG and Lowe Property Group would love to host city staff and planning commission members on a tour of Post District.

This application represents the first phase of a larger block development and is approximately 5.5 acres which will consist of four parcels (Lots 1, 2, 3, & 5 as shown on sheet CSP-1) and will house two apartment buildings that, will provide a mix of residential, corporate housing and hospitality uses (Buildings 1 & 3), as shown in the image below in light blue. The mix between long-term rentals, corporate housing rentals and hospitality suites is intended to be flexible as dictated by the market over time. These two buildings will collectively include approximately 286 residential units and approximately 6,750 square feet of retail. It will also include an adaptive reuse of two existing buildings (Miller and Casket, Lots 2 & 5).
Phase 1

Existing Use

The entire block is zoned as CG, General Commercial District. Within the CG zoning designation, a large variety of different uses are permitted, including residential, retail, hospitality, and office (see table 21A.33.030). The current existing use of this block is predominantly warehouse, manufacturing, and commercial as the zoning permits. Over the years this site has been home to flour mills, coal yards, a farm repair shop, casket manufacturing, a concrete plant, and more. Historically this site has been this same usage for many decades, and over the years little improvement has been infused into these buildings. As a result, this block has become dilapidated, and very little useful life is left remaining in many of the buildings. Herein lies the opportunity.
Proposed Use

We support the current CG zoning designation in place and propose a permitted multifamily and/or hospitality use for this area. On this site, we are planning two residential buildings with thoughtfully located ground floor retail and parking.

Building 1 will be 5 stories of Type IIIA construction over one level of Type IA. This building will have a bold new design that will house approximately 65 units with a range of sizes. A greater description of number, size and type of units is provided within the Site Summary table on sheet A1-1 of the architectural sheets. On the ground level of building 1, approximately 6,750 square feet of retail space is planned and oriented toward the central park, which is just east of this building. This will create active use and visual interest on the main floor.

Building 3 is the largest building and will consist of approximately 220 units within 5 levels of Type IIIA over one level of Type IA podium. These units will have a range of studios, 1-bedroom units, and 2-bedroom units (see sheet A1-1 for more specifics on quantity, size, and schematic layout of units). All amenity spaces for both buildings will reside here and will feature views that overlook the central park and the old iconic silos, namely a resort-style pool deck, an oversized gym, and a rooftop clubroom and perch. Building 3 will also contain approximately 68 parking spaces on the main floor.

The Miller Building will be adapted to house indoor parking for the residents and the parking lot north of the Miller will park residents and retail patrons. The Casket Building will be repurposed to a retail or commercial use, dictated by the market.

Central to this development is a large urban park that will be an amenity unlike any other within Salt Lake City. This park will be an open space that offers community gathering and relief to the surrounding built environment. Residents, patrons, and guests will be able to interact with the park that will abut the old silos and enjoy the diverse programs that will ensue.

2. Planned Development Information

Per 21A.55.010, the Silo Park Apartments have been meticulously planned with the best development practices in mind. We are meeting the purpose and objectives of a planned development through:
A. Open Space and Natural Lands: We are creating open spaces where there once was none by transforming a blighted industrial area. Within this development we will provide multiple areas where residents can access the outdoors, including pool and rooftop decks and the park. The park will be the heart of the project, and by design, we are orienting as many units as possible toward the central park to create views that enhance the experience. This will be an open space where many will gather and recreate with programing throughout the year.

B. Historic Preservation: Within the greater development area, we are preserving a portion of the historic and iconic white grain silos that everyone recognizes along 500 South. These silos are a landmark and the namesake of the Granary District and will be kept. We will also be preserving parts of the old mill building and engaging in adaptive reuse as we salvage older brick buildings and warehouses along 600 South (Casket Co. Building and Miller Building).

C. Housing: We will be developing approximately 180 affordable housing units within the greater development area on Lot 1. There will be a mix of studios, 1-bedroom, and 2-bedroom units and 100% of the units will be for those at 60% or less of the Area Median Income. Additionally, within Building 1, we will be offering smaller studio units under 400 square feet, which will be a fairly unique offering within the market. These units will provide a lower price point future tenants.

D. Mobility: Within our development we are creating a more walkable network of new roads, sidewalks, and paths which will enable pedestrians’ access and mobility that has not been available in the past. We have two new midblock streets that will run both east/west and north/south. This will greatly increase permeability into the block for all modes of transportation.

E. Sustainability: Sustainability is top of mind as we proceed with our design. Creating mid-rise units within an urban core puts much less strain on natural resources and infrastructure necessary for housing. We have engaged consultants and design professionals and have challenged them with energy efficiency initiatives and goals such as Energy Star. We will strive to design all systems to be efficient and sustainable. Upon completion, we will also be participating in Rocky Mountain Power’s Blue Sky program, which directly supports renewable energy. Furthermore, where Building 3 is planned, an old coal yard existed that abandoned a large amount of coal. Over time, harmful contaminants have leached into the soil and have caused the soil to become contaminated to levels above acceptable levels. We have engaged an environmental engineer to assist us in the remediation process with
the State’s Department of Environmental Quality, Division of Waste Management and Radiation Control.

F. Master Plan Implementation: We have aligned our objectives to meet the vision of Salt Lake City’s Master Plan. This project sits right in between the two “Grand Boulevards” of the city, 500 and 600 South. These are the major points of ingress and egress to Salt Lake City for many traveling by car, and as such we want the first and last impressions to be exciting, inspiring, and memorable. Within this district, the Salt Lake City Master Plan envisions mid-rise buildings that shape the street edge. We intend to carry forth the vision of the Grand Boulevards through the entire block by introducing a diverse mix of uses. The multifamily housing planned for this block will introduce unique rooflines that will truly be exciting, inspiring, and memorable.

The Standards for Planned Developments, as stated in 21A.55.050 will be met through:

A. Planned Development Objectives: Many objectives of a Planned Development within the Silo Park Apartments are being met and exceeded. We are preserving open space by creating an urban park where people can gather and recreate, we are increasing mobility throughout the area with new roads, sidewalks, and paths, we are designing all new buildings with sustainability and energy efficiency in mind, we are remediating contaminated soil, and we are implementing the Master Plan that Salt Lake City has been issued within the specific “Grand Boulevard District” vision.

The areas where consideration would be appreciated is specifically on the south side of Building 3, along 600 South where we are requesting a reduction to the required 10’ setback. The building setback is planned to match the existing placement of the historic Midwest Casket Co. building and Miller Building along 600 South and further west (see attached image below looking northwest along 600 South). Furthermore, the Post District project that is directly one block east does not have any setbacks on both adaptive reuse and new buildings (see attached image below of the view looking east along 600 South). Many zones in this area encourage or require minimal setbacks in order to create a walkable, urban landscape, and the reduction of the setback along 600 South is appropriate for the pedestrian friendly uses being planned on this site. No sight lines will be impacted and the street aesthetic will be enhanced as the building placement will allow the visual character of this side of the street to be maintained. By allowing no setback along the south side of Building 3, consistency and continuity will be maintained all along 600 South, with a preservation of past precedence.
Additionally, the proposed parcel where Building 1 sits is a lot that does not have proper street frontage. Even though it sits internal to the block, it can still be reached through two private drives (one off of 400 West and the other off of 600 S) and service vehicles can pass one-way behind Building 1 on the west side. Beyond accessibility is the fact that it sits directly west of the Silo Park, which is the heartbeat of the development. The entire ground level will be activated with retail and will face and engage with the park. This will draw patrons and the public interior to the block. Imagine the excitement and energy of this truly mixed-use area!
B. Master Plan Compatibility: As stated above, we are in agreement and compliance with the Master Plan that the City has issued.

C. Design and Compatibility: The Silo Park Apartments will integrate incredibly well with the surrounding area. Directly east of this development area is the Post District project, which shares many key attributes to this development, namely: inspiring and memorable design, preservation of historic buildings, no setbacks along 600 South, unique roof lines and building materials, and a mix of pedestrian friendly uses. The Silo Park Apartments will integrate seamlessly into the neighborhood and provide exciting visual interest and enhancement to the block.

D. Landscaping: Silo Park Apartments will work diligently to design all landscaping in accordance with City standards and requirements. The landscaping plan will be efficient, utilize native and drought tolerant plants, and an efficient drip/smart irrigation system. Additionally, since both of the buildings we have proposed are greater than 60’ in height, we will be submitting for a modification through a design review process. Attached within our updated sheets is L-102 which provides a clear calculation of the additional required landscaping per the CG zone. The amount of landscaping that will be provided through the central park exceeds the needs of Building 1 and Building 3 will not rely on the park since there are many open and landscaped areas that will be available to the public. Because greater density can be created, this allows for greater open space to occur, which we all know creates wonderful moments in an urban setting.

E. Mobility: By building downtown, various transportation modes are more readily available, thus helping alleviate resources and congestion elsewhere in the city and broader community. In developing units close to the major entrance and exit to the city, accessibility is greatly improved, and less demand is placed on internal city streets. We plan on installing a bike share program and multiple bike lockers to promote bicycling. A future Trax station is also planned to run in between 500 and 600 South along 400 West that will allow even greater transportation options in the future. With so many amenities on and so close to this site, this location will only foster greater pedestrian traffic.

F. Existing Site Features: Existing building stock on site has been surveyed and several structures are deemed worth saving and worth re-investment. A major portion of the Silos will remain and be the focal point of the entire block, most notably the public park. Directly North of the Silos, a portion of the Mill Building will be re-purposed providing activation along 500 South. In addition, the existing Miller Warehouse and Casket Co. Building along 600 South will be repositioned to include a retail pad providing activation along the city
entrance. The remainder of the building stock has been deemed utilitarian and are not significant enough to preserve.

G. Utilities: The proposed and existing utilities will adequately serve the development and not have a detrimental effect on the surrounding area. We intend to eliminate some of the overhead powerlines, data lines, and poles to further enhance the area.

The plan for long term maintenance of all private infrastructure as stated in 21A.55.110 will be handled through Covenants, Conditions, and Restrictions (CC&Rs) and internal development agreements. The two residential buildings and all private infrastructure will all be managed and maintained through one property management team that will be hired by the owner. We have not yet identified the property management team, however, we will ensure that all private infrastructure will be maintained and handled in a professional manner.

3. Minimum Plan Requirements

Please find attached copies of each plan and elevation drawing within the Architectural sheets included within this submittal.

4. Site Plan

Please see the attached Site Plan (CSP-1) within the Architectural sheets included within this submittal.

5. Elevation Drawing

Please see sheets A2-1 – A3-3 within the attached Architectural sheets that provide detailed elevation, sections, and profile drawings. The type of construction and construction materials can be found on sheets A0-3 and sheets A2-1 – A2-5. Exterior building material colors reflect design intent. Final material specifications will be selected after further product review during Plan Check and construction. The approximate number, size, and type of dwelling units in each building can be found on the project data sheet on page A0-1.

As demonstrated above, the Silo Park Apartments project seeks to create a pedestrian-friendly development that encourages a high level of community interaction and efficient modes of transportation to all residents. It’s our belief that Silo Park Apartments meet the intent of the Planned Development standards and functions as an integral piece of the greater redevelopment
plan for this block. We are confident that the design elements mentioned above, including the requested variances, will make Silo Park Apartments a project we all can be proud of.

Keith Smith

Vice-President
Lowe Property Group
Images of Existing Site

Overhead view of Silos block

View from 400 W, looking west/northwest at Building 3’s future location.
View from 400 W, looking west/southwest at Building 3’s future location.

View facing west from 400 West
View from 400 West looking west.
CORRECTIVE ACTION PLAN
SILOS SOUTH APARTMENTS
554 SOUTH 400 WEST AND 470 WEST 600 SOUTH
SALT LAKE CITY, UTAH

Project No. 2439-014C

Prepared for:
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Utah Department of Environmental Quality
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Michael S. Cronin, P.G.
Senior Project Manager and Senior Project Geologist
October 18, 2022
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APPENDICES

Appendix A – Standard Operating Procedures
CORRECTIVE ACTION PLAN
SILOS SOUTH APARTMENTS
554 SOUTH 400 WEST AND 470 WEST 600 SOUTH
SALT LAKE CITY, UTAH

1. INTRODUCTION

On behalf of Silos South Apartments, LLC, the owner (Owner) of Silos South Apartments (Facility), Wasatch Environmental, Inc. (Wasatch), has prepared this Corrective Action Plan (CAP) for addressing polycyclic aromatic hydrocarbon (PAH) impacts to soil that have been identified at the Facility. The Facility is located at the northwest corner of 600 South 400 West in Salt Lake City, Utah (as shown on Figure 1). The work described herein will also be performed in accordance with a site-specific Health and Safety Plan (HASP).

The Facility, now referred to as "Silos South Apartments", consists of the northern portions of two different properties that Wasatch previously investigated for the Owner: "Skola" and "Six Bugs". The Facility includes the areas of both "Skola" and "Six Bugs" that have been impacted by historical use as a coal yard, as described in greater detail in Section 1.2 of this CAP.

The Owner submitted an application for regulatory oversight to the Utah Division of Waste Management and Radiation Control (DWMRC) on July 8, 2022.

The Owner anticipates redeveloping the Facility for mixed use and wishes to achieve regulatory closure with a status of Corrective Action Complete Without Controls (CACWOC).

Wasatch and the Owner anticipate that corrective action at the Facility will involve excavation and off-Site disposal of the coal and any soil that has been impacted by the coal at concentrations exceeding United States Environmental Protection Agency (U.S. EPA) Regional Screening Levels (RSLs) for Residential Soil.

1.1 Facility Description

The Facility is located at 554 South 400 West and 470 West 600 South in Salt Lake City, Utah (see Figure 1). The Facility is identified by the Salt Lake County Assessor's Office as the northern portions of Parcel Numbers 15-01-377-008, 15-01-377-009, 15-01-377-010, 15-01-377-011, 15-01-377-016, and 15-01-377-017 and totals approximately 2.6 acres.

The Facility is bordered to the north by a mix of commercial and multifamily residential development, to the east by 400 West and then multifamily residential development, to the south by commercial development and then 600 South, to the west by 500 West and then multifamily residential development (see Figure 2).

The eastern portion of the Facility (previously investigated under the name "Skola") is developed with an approximately 7,070-square-foot, dock high, concrete office/warehouse building constructed in 1939. This building is currently used only for storage. The remainder of the eastern portion of the Facility consists of concrete paving, a rail spur, and landscaping. The western portion of the Facility (previously investigated under the name "Six Bugs") was most recently occupied by paved storage yard for Ideal Cement. Facility features are shown on Figure 3.

1.2 Facility Background

Phase I Environmental Site Assessments (ESAs) completed by Wasatch indicate that the Facility was occupied by a coal yard between at least 1892 and 1939. The coal yard initially operated as the W.J. Wolstenholme's Coal Yard in the late 1800s, then the Western Fuel Company Coal Yards in the 1900s. As it has been Wasatch's experience that coal was commonly left behind and/or buried at historical coal...
yards and the coal would leach polycyclic aromatic hydrocarbons (PAHs) into the surrounding native soils, the potential for impacts to the Facility from the former coal yard represented a recognized environmental condition (REC) and the Facility was subjected to subsurface investigation work. Subsurface investigations conducted by Wasatch identified PAH concentrations in soil at concentrations exceeding U.S. EPA RSLs for Residential Soils. In some cases, the coal exhibits PAH concentrations that exceed the U.S. EPA RSLs for Industrial Soil. These impacts generally extend laterally throughout the Facility, but in most locations do not extend deeper than approximately 3 to 4 feet below ground surface (bgs). The top of the coal layer was typically observed at a depth between 1 and 2 feet bgs, and the bottom of the coal layer was typically observed at a depth of between 2 and 3 feet bgs. There are no documented impacts to groundwater at the Facility.

Facility is currently subject to regulatory oversight by the Utah DWMRC. The Utah DWMRC was provided with copies of the relevant reports and documentation for the Facility.

1.3 Objectives

The Owner plans to redevelop the Facility as part of a larger redevelopment project that also includes Owner-controlled off-site properties adjoining the north and south sides of the Facility. The Owner plans to redevelop the Facility with a parking structure and multifamily residential development. Given the nature of the distribution of contaminants and the desire for a residential component to future land use, the Owner anticipates remediating the Facility to meet U.S. EPA RSLs for Residential Soils as specified in Section 3.2 of this CAP.

1.4 Conceptual Site Model

The Facility is located within the discharge area for the basin-fill aquifer system, near the eastern boundary of the secondary recharge area. The discharge area of the basin-fill aquifer system is characterized by a shallow unconfined aquifer overlying a deep confined aquifer, with a confining layer (aquitard) separating the shallow unconfined aquifer from the deep confined aquifer. The discharge area exhibits an upward vertical hydraulic gradient. Depth to groundwater for the shallow aquifer is approximately 10 to 11 feet bgs at the Facility. The hydraulic gradient for the shallow aquifer at the Facility is assumed to be generally to the northwest. There are no documented impacts to groundwater at the Facility.

Soils at the Facility consist of coal, clay and silty clay (CL), and surficial fill consisting of sandy gravel (SW). Impacts to soil consist of PAHs in the coal and soil immediately underlying the coal (generally the uppermost 3 feet of soil at the Facility).

Given the nature of the contaminants and the concentrations detected at the Facility, vapor intrusion associated with the release(s) from the Facility is not considered a significant risk.

2. RISK ASSESSMENT

Given the objective of achieving residential cleanup levels, a human health and ecological risk assessments would not be applicable to corrective action at this Facility at this time.

3. CORRECTIVE ACTION SELECTION

3.1 Contaminants of Concern

Contaminants of concern include PAHs in soil, specifically: benzo(a)anthracene, benzo(a)pyrene (B(a)P), benzo(b)fluoranthene, indeno(1,2,3-c,d)pyrene, and naphthalene at concentrations exceeding the U.S. EPA Industrial RSLs for soil; and 1-methylnaphthalene, benzo(k)fluoranthene, chrysene, and dibenz(a,h)anthracene at concentrations exceeding the U.S. EPA Residential RSLs for soil.
3.2 Proposed Cleanup Levels

The proposed cleanup levels for soil at the Facility are the U.S. EPA RSLs for Residential Soil. The cleanup levels are protective of human health and the environment, and appropriate for anticipated future use of the Facility.

3.3 Proposed Corrective Action Measures

Given the Facility characteristics, nature and distribution of contaminants, and proposed future land use; Wasatch proposes the excavation and off-site disposal of the coal and any soil exceeding the U.S. EPA Residential RSLs for PAHs in soil.

3.4 Proposed Engineering and Institutional Controls

As Wasatch and the Owner anticipate corrective action at the Facility meeting residential land use criteria, the use of engineering and/or institutional controls should not be required. The use of engineering and/or institutional controls will be reconsidered in the event that the corrective action fails to fully achieve the proposed cleanup levels. Wasatch and the Owner understand that cumulative excess cancer risk must be within the $1 \times 10^{-4}$ range following completion of corrective action before engineering and institution controls may be used to address the residual risk. Implementing engineering and/or institutional controls to manage residual exposure risks at the Facility would require an Environmental Covenant (EC) and Site Management Plan (SMP) for the Facility. The SMP would be subject to a 30-day public comment period.

4. CORRECTIVE ACTION DESIGN AND CONSTRUCTION

Details of the remedial design, such as precise excavation boundaries and depths, may be subject to revision based on unforeseen site conditions and the results of any additional sampling that may be performed (such as confirmation soil sampling). Any substantive revisions to the approved CAP would be submitted in writing to, and would be subject to review and approval by, the Utah DWMRC, prior to implementation. The proposed excavation boundaries and confirmation sample locations are illustrated on Figure 4.

Prior to commencement of the corrective action work at the Facility, utilities will be terminated, and any universal waste remaining at the Facility will be removed and disposed off-site. The office/warehouse building will be demolished and concrete and asphalt pavement will be removed from the Facility and disposed off-site.

The following best management practices would be employed during implementation of the remedies specified in this CAP:

- The Owner would have a pre-demolition inspection performed, have universal wastes and any asbestos-containing building materials removed and properly disposed, and obtain a demolition permit prior to demolition of the existing structure.
- Storm drain openings would be covered and runoff would be controlled during building demolition, drilling, and excavation activities to prevent mud and contaminants from entering the storm sewer system.
- Facility access would be limited by erecting temporary chain-link fencing around the Facility prior to commencement of the remediation field work. The fencing would remain in place for the duration of the field work.
- Wasatch will monitor the breathing space at the property boundaries and the work zone using a photoionization detector (PID).

Wasatch anticipates that soil and coal will be removed to an average depth of approximately 3 to 3.5 feet throughout the Facility, with removal in some locations extending deeper (4.5 to 5.5 feet) near GP-7, GP-19, and GP-20, and as may be indicated by soil confirmation sampling results. Wasatch anticipates that
a total of approximately 19,000 to 22,000 tons of impacted soil and coal will be removed from the Facility for off-site disposal. The excavation will be backfilled with clean imported fill material and compacted.

5. PERMITTING REQUIREMENTS

5.1 Blue Stakes Utility Clearance Request

A utility clearance request would be submitted to Blue Stakes at least two full business days prior to the commencement of the remediation work (in accordance with SOP 1). The Blue Stakes utility clearance would be renewed every 12 calendar days for the duration of the project.

5.2 Storm Water Pollution Prevention Plan (SWPPP)

As the area of disturbance occupies more than 1 acre, a SWPPP is required for the work described in this CAP. A SWPPP, subject to review and approval by the Division of Water Quality (DWQ) will be in place for the project prior to commencement of invasive field work.

5.3 Utah Division of Air Quality (DAQ) Requirements

Because the area of disturbance is greater than ¼-acre in extent, a fugitive dust control plan is required for this project. A fugitive dust control plan, subject to review and approval by the DAQ, will be in place for the project prior to commencement of invasive field work.

6. NOTIFICATIONS

The following notification requirements will be met:

- The Salt Lake County Health Department will be notified 72 hours prior to commencement of field work related to the corrective action.
- The Utah DWMRC will be notified at least 10 days prior to any field work.
- As a courtesy, businesses and residents located adjacent to the Facility will be notified at least 14 days prior to commencement of the remediation work.
- If an SMP is required to achieve regulatory closure, a 30-day public comment period will be required for the SMP.

7. SAMPLING AND ANALYSIS

Sampling methods and procedures specified in this CAP, and the SOPs presented in Appendix A, are intended to apply to sampling activities specified in this CAP as well as to future work plans which may be submitted to both the Owner and the Utah DWMRC project manager for review and approval. Sampling activities will be planned so as to meet the project objectives detailed in Section 1.3 of this CAP.

Sampling methods and procedures as addressed in this CAP and future work plans may be conducted in conjunction with:

- Any remaining site characterization issues that may arise,
- Implementation and evaluation of the selected remedy to address impacted soil at the Facility,
- Soil confirmation sampling following the implementation of the selected remedy,
- Soil confirmation sampling following the removal of any previously unidentified subsurface features where contamination is observed or suspected, and
- Waste characterization sampling.

Although drilling at the Facility to facilitate sampling is not anticipated, utility clearance will be requested through Blue Stakes of Utah prior to commencement of any sampling activities that will require drilling, should drilling become necessary. Additionally, if drilling becomes necessary in or adjacent to a public
right of way, all necessary permits (i.e., right of way encroachment permits, etc.) will be obtained by Wasatch and drilling contractor prior to commencement of such drilling activities.

The sampling methods and field procedures Wasatch anticipates utilizing are presented as SOPs contained in Appendix A of this CAP. The specific sampling methods to be utilized for each phase of work will be identified, and the appropriate SOPs have been referenced in this CAP and will be referenced in each work plan that is submitted for review and approval. If sampling methods become beneficial or necessary that are not included in the SOPs, an SOP will be developed for such sampling methods. The new SOPs will be presented in the applicable work plan and amended to the CAP.

The laboratory analytical methods Wasatch anticipates utilizing for most aspects of the project are summarized in Table 1. Additional laboratory analytical methods will be required for waste characterization. Laboratory analytical requirements for waste characterization will be dependent upon the waste media, analytes detected in the environmental samples associated with the waste, requirements stipulated by the receiving facility, and regulatory requirements. The standard laboratory analytical methods Wasatch anticipates utilizing are summarized in Table 2 (subject to modification at the request of the receiving facility).

7.1 Waste Characterization Sampling

On September 27, 2022, Wasatch conducted waste characterization sampling as described in the work plan dated August 12, 2022, and approved by the DWMRC in their letter dated September 7, 2022. Although the laboratory analytical results were not available at the time this CAP was authored, Wasatch will evaluate the waste characterization data and submit the data to the DWMRC along with an application for a "contained-out" determination for each material (e.g., coal, underlying soil, and overburden). Based on the laboratory analytical results obtained from the investigation samples, Wasatch anticipates that all of the waste soil will be approved for disposal at the Salt Lake County Landfill. Wasatch would perform any additional waste characterization sampling in accordance with the CAP and complete the appropriate waste profiles to be approved by the facility receiving the waste based on the waste characterization sampling results. Wasatch assumes that the waste soils will be directly loaded into dump trucks for transport to the landfill. Analysis of waste characterization samples would be performed as specified in Table 2, subject to revision to accommodate any additional analyses that may be required by the receiving facility. Wasatch anticipates that waste soil will be transported by the excavation contractor and disposed at the Salt Lake County Landfill (disposal Facility).

7.2 Soil Confirmation Sampling

Wasatch would collect soil confirmation samples from the surface of the sidewalks and floor of the excavation in general accordance with SOP 2 (Shallow and Surface Soil Sampling). Wasatch anticipates collecting 16 confirmation soil samples from the sidewalks of the excavation and 19 samples from the floor of the excavation (on approximately 100-foot spacings as shown on Figure 4), to verify that cleanup levels have been met and document the PAH concentrations left in place at the Facility. The proposed soil confirmation sampling locations are depicted on Figure 2. All samples will be documented and handled in general accordance with SOP 9 (Sample Documentation and Handling).

Sampling equipment would be decontaminated prior to collecting the first sample, and immediately following the collection of each sample, in general accordance with SOP 6 (Decontamination). Water generated during decontamination, and all other investigation-derived waste, would be managed in general accordance with SOP 6 (Management of Investigation-Derived Waste).

Soil confirmation samples would also be collected from the floor and sidewalks of any excavations conducted at the Facility where contamination has been identified in association with any previously unidentified subsurface features discovered when the floor slabs are removed.
8. CONTINGENCY PLANNING

Samples would be collected from beneath any previously unidentified subsurface features where there may be indications of a release. If contamination above residential screening levels is confirmed through this sampling; the soil would be excavated, Wasatch would perform waste characterization sampling, and Wasatch would complete the appropriate waste profiles to be approved by the facility receiving the waste. All waste would be properly contained in labeled 55-gallon drums or roll-off containers pending laboratory analysis and proper transport and disposal.

If contamination is discovered in unexpected locations, at unexpected concentrations, or if new contaminants discovered that were not expected based on Facility history and previous data, Wasatch would immediately communicate relevant findings to the Owner and the Utah DWMRC and work to develop an appropriate remedial alternative.

If the data resulting from confirmation sampling indicate that the remedial strategy, after implementation, has not been effective at remediating the contamination, Wasatch would immediately communicate relevant findings to the Owner and the Utah DWMRC and work to develop an appropriate remedial alternative.

It is impossible for Wasatch to develop specific contingencies and speculate as to what specific responses would be appropriate, without knowing the specific conditions and circumstances to which the contingencies are responding. Contingency responses would always be developed in a manner consistent with the intended land use, applicable laws and regulations, and with the objectives expressed by the Owner.

9. QUALITY ASSURANCE/QUALITY CONTROL (QA/QC)

All laboratory data generated as an aspect of this corrective action, with the exception of the waste characterization data, will be subject to third-party data validation and appropriate QA/QC samples will be collected to support data validation.

9.1 Data Quality Parameters and Objectives

The overall QA/QC objective for this project is to develop and implement procedures for field sampling, chain-of-custody, laboratory analyses, and reporting that will provide results, which are valid and legally defensible in a court of law. The purpose of implementing these procedures is to assess the data obtained with respect to the data quality parameters of precision, representativeness, accuracy, completeness, and comparability for both the laboratory analytical program and field sample collection activities. The primary goal of the program is to ensure that the data generated are representative of environmental conditions at the Facility. To achieve this goal, a combination of quantitative procedures and qualitative evaluations will be used to assess the data quality. Precision, accuracy, representativeness, completeness, and comparability (PARCC) will be computed in the manner described in the following paragraphs. A qualitative assessment of PARCC factors will be made and will be documented. Data quality objectives (DQOs) are qualitative and quantitative statements that specify the quality of the data required to support decisions made during project activities and are based on the end uses of the data to be collected. The DQOs for this project are summarized in Table 3.

Field QC sample types and quantities by matrix are summarized in Table 4.

9.2 Precision

Precision is a measure of mutual agreement among individual measurements of the same property, usually under prescribed similar conditions, and typically expressed in terms of the standard deviation or relative percent difference (RPD).
9.2.1 **Field Data Precision**

Field precision will be assessed through the collection and analysis of field duplicates and comparing the analytical results of the field duplicates to the analytical results of the environmental samples.

9.2.2 **Laboratory Data Precision**

Laboratory precision will be assessed through the calculation of RPD and/or relative standard deviations (RSD) for duplicate samples. Analytical precision will be measured by comparing analytical results for matrix spike (MS) and matrix spike duplicate (MSD) samples and internal laboratory samples that may be analyzed according to analytical method or laboratory standard operating procedure requirements. Acceptance criteria for analytical precision will be based on established laboratory quality control limits for individual analytes. Applicable control limits are based on statistically valid historical data compiled by the laboratory, which meet or exceed precision requirements specified by the analytical method. SOPs are on file with the selected project laboratory.

9.3 **Accuracy**

Accuracy is the degree of agreement of a measurement with an accepted reference or true value. The accuracy of the analytical data will be assessed by examining possible sources of error that may bias the analytical results.

9.3.1 **Field Data Accuracy**

Sources of the errors in the field can occur during sampling (i.e., cross contamination from sampling equipment, etc.), field handling, and transportation. Accuracy in the field will be assessed by documenting adherence to SOPs for sample collection, preservation, and handling; and through preparation and analysis of trip blanks and equipment blanks.

9.3.2 **Laboratory Data Accuracy**

Sources of errors in the laboratory can occur during sample preparation and analysis, duplicate and control sample preparation, and instrument and quantification errors. Laboratory accuracy is assessed through the analysis of standard reference materials (SRMs) in laboratory control samples, MSs, MSDs, and surrogate compounds and the determination of their recoveries in terms of percentage. Control limits are established by the laboratory for each analyte based on statistically valid historical recovery results, which meet or exceed the requirements specified by the analytical method. In addition, the project laboratory will analyze method blanks to determine the potential for contamination introduced at any stage of sample preparation or analysis. Laboratory control limits and frequency for spike recovery and method blank analysis are specified in SOPs for each analytical method, which are on file with the selected project laboratory.

9.4 **Representativeness**

Representativeness is a qualitative parameter that expresses the degree to which sample data accurately and precisely represent a characteristic of a population, parameter variations at a sampling point, or an environmental condition. As such, representativeness requires the selection of appropriate analytical methods, sampling protocols, and sampling locations such that results are representative of the media being sampled and conditions being measured.
9.4.1 Field Data Representativeness

Representativeness is dependent upon the proper design of the sampling program and will be satisfied by ensuring that the CAP, and the specific procedures contained therein, is followed.

9.4.2 Laboratory Data Representativeness

Representativeness in the laboratory is ensured by carefully following standard laboratory analytical methods and procedures, meeting sample holding times, specifying detection limits that are at or below regulatory standards, and analyzing method blanks to check for laboratory contamination. Sample results will not be considered representative if contaminants are detected in the method blanks, or if the reporting limits are above the specified screening levels.

9.5 Completeness

Completeness is an assessment of the number of valid measurements obtained in relation to the total number of measurements planned for the successful achievement of the investigative objectives. Completeness will be expressed as the percentage of valid measurements to the total number of measurements. The closer the numbers, the more complete the measurement process.

9.5.1 Field Data Completeness

Field completeness evaluates the number of valid measurements obtained from all measurements taken in the project. The intent of this program is to attempt to achieve a goal of 100 percent completeness. Realizing that under normal conditions this goal may not be achievable, the completeness goal for this program is 85 percent. This completeness goal is considered adequate to meet the DQOs for this Facility based on prior consideration of PARCC parameters, the sampling plan designs, and data collection activities proposed for each medium.

9.5.2 Laboratory Data Completeness

Laboratory completeness evaluates the number of valid measurements obtained from all the measurements taken in the project. The intent of this program is to attempt to achieve a goal of 100 percent laboratory completeness. Realizing that under normal conditions this goal may not be achievable, the laboratory completeness goal for this program is 85 percent.

9.6 Comparability

Comparability is a qualitative parameter expressing the confidence with which one data set may be compared to another. Data sets will be compared only when precision and accuracy meet the specified acceptance criteria established in this section. Samples will be collected, and analytical results will be reported according to standard procedures and methods to ensure comparability with other similar data and results. The comparability goal will be achieved by following the CAP, and the specific procedures contained therein, and by collecting and analyzing representative samples, specifying analysis by similar analytical procedures with comparable reporting limits and by reporting analytical results in appropriate and consistent units.

9.6.1 Field Data Comparability

Comparability is dependent upon the proper design of the sampling program and will be satisfied by ensuring that the CAP is followed and that proper sampling procedures are used.

9.6.2 Laboratory Data Comparability

Analytical data will be considered comparable when similar sampling and analytical methods are used and documented. Similar QA objectives will be used throughout the project to ensure
comparability. At the discretion of the Utah DWMRC, split samples may be collected for submittal to a third-party laboratory to assist in evaluation of comparability. The frequency at which split samples are collected and analyzed will be specified by the Utah DWMRC following the receipt and approval of individual work plans for the project.

9.7 Sensitivity

Sensitivity is the capability of a method or instrument to discriminate between measurement response(s) representing differing levels of the variable of interest. The analytical laboratory, as part of their standard operating procedures, follows published, approved analytical methods which validate the methods including an evaluation of sensitivity, precision, and accuracy to ensure that the equipment can operate properly prior to sample analysis. Sensitivity is evaluated by comparing screening or action levels to the laboratory reporting detection limit (RDL). The acceptable level of sensitivity for this project is 100% of RDLs below selected screening or action levels. Wasatch will review the laboratory detection and/or reporting limits to verify these limits are below applicable screening levels. If sensitivity fails, Wasatch will evaluate the root cause of the failure and correct that root cause to the extent it can be corrected. Corrective measures for isolated failures may include re-analysis by the laboratory and/or re-sampling. There may rarely be instances in which there is no combination of field and laboratory techniques that can achieve the desired sensitivity. Such instances will be identified and documented when they occur.

9.8 Field QA/QC

A variety of QC samples will be collected to facilitate the evaluation of the data quality parameters. An explanation of each type of field QC sample is provided below. A summary of the quantity of each QC sample type to be collected for each environmental medium (matrix type) is presented as Table 4.

9.8.1 Matrix Spike (MS)/Matrix Spike Duplicate (MSD)

MS/MSDs are QC samples collected in the field for use by the analytical laboratory. The MS/MSDs are selected to be representative of the environmental matrix at the Facility. The laboratory spikes the MS/MSDs with a known quantity of the analyte of interest. The MS and MSD are then analyzed by the laboratory along with an un-spiked sample and the environmental samples from the Facility to evaluate the accuracy and precision of the analytical method for that specific sample. A minimum of one MS/MSD will be collected for each matrix (soil and groundwater samples only) for each sample delivery group, or one MS/MSD for each matrix (soil and groundwater only) for every 20 environmental samples, whichever is greater.

9.8.2 Field Duplicate

A field duplicate is a QC sample collected from the same location as an environmental sample, and collected simultaneously, or immediately following, the collection of the environmental sample. Field duplicates are collected, handled, and analyzed in an identical manner to the environmental samples. The sample labeling and chain of custody documentation will not indicate that a sample is a field duplicate (they are blind duplicates) so the analytical laboratory is not aware that the field duplicate is a QC sample. Field duplicates are analyzed by the laboratory along with the environmental samples. The analytical results for the field duplicate are then compared to the analytical results for the environmental sample as an indicator of the overall sampling and analytical precision. One field duplicate will be collected for each matrix (soil, groundwater, and indoor air samples only) for every 10 environmental samples for each matrix. A minimum of one field duplicate per matrix will be collected for each sampling event.

9.8.3 Equipment Blank

An equipment blank (also referred to as an equipment rinsate blank) is a QC sample collected by pouring deionized water over sampling equipment after the sampling equipment has been completely decontaminated. Equipment blanks will only be collected when non-dedicated and
non-disposable sampling equipment are used. Equipment blanks will be analyzed for the same analytes as the environmental samples. The analytical results for the equipment blanks are used to evaluate the adequacy of the decontamination procedures used to prevent cross-contamination between sampling locations. One equipment blank will be collected for each matrix (only soil samples are anticipated for this project) for every 20 environmental samples for each matrix.

9.8.4 Trip Blank

A trip blank is a QC sample prepared by the laboratory consisting of a set of sample vials filled with deionized water. Trip blanks are transported and stored with environmental samples (soil and groundwater samples only) that are to be analyzed for volatile organic compounds (VOCs). Trip blanks are analyzed for VOCs only. Trip blanks are collected and analyzed to evaluate for cross-contamination of VOC samples due to diffusion that may occur during transport and storage of environmental samples. One trip blank will be included in each cooler used to transport VOC samples.

9.8.5 Split Samples

A split sample is a QC sample collected from the same location as an environmental sample, and collected simultaneously, or immediately following, the collection of the environmental sample. Split samples are transported and analyzed separately (and by a different analytical laboratory) than the environmental samples. The analytical results for the split sample are then compared to the analytical results for the environmental sample as an indicator of the overall analytical accuracy and precision. The Utah DWMRC may collect splits of soil samples at their discretion.

10. CORRECTIVE ACTION IMPLEMENTATION REPORT

Following completion of the corrective action, Wasatch would produce a corrective action implementation report documenting the results of the corrective action. The report would include:

- narrative text explaining objectives, methods, results, and presenting conclusions and recommendations, and documenting any deviations from the approved CAP;
- data tables;
- figure(s) depicting the location of confirmation samples and other relevant features;
- photographs;
- laboratory analytical reports;
- data validation reports; and
- copies of permits and approvals.

11. HEALTH AND SAFETY

All corrective action activities at the Facility would be performed by Wasatch and our subcontractors in accordance with Wasatch's general health and safety policy. A site-specific health and safety plan would also be prepared to address specific health and safety concerns and establish protocols for conducting work related activities in a safe manner.

12. PROJECT SCHEDULE

The Owner and Wasatch anticipate commencing corrective action in February/March 2023. Wasatch would communicate scheduling details with the Utah DWMRC as the schedule develops.
Tables
<table>
<thead>
<tr>
<th>Target Analytes</th>
<th>Environmental Media</th>
<th>Laboratory Analytical Methods</th>
</tr>
</thead>
<tbody>
<tr>
<td>Polycyclic Aromatic Hydrocarbons (PAHs), full scan and single selected ion mode (SIM)</td>
<td>Soil</td>
<td>SW-846 8270E</td>
</tr>
<tr>
<td></td>
<td>Groundwater</td>
<td>Not applicable</td>
</tr>
<tr>
<td></td>
<td>Soil Gas</td>
<td>Not applicable</td>
</tr>
<tr>
<td></td>
<td>Indoor Air</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>
### Table 2
Summary of Standard Laboratory Analytical Methods for Waste Characterization

<table>
<thead>
<tr>
<th>Waste Media</th>
<th>Target Analytes</th>
<th>Laboratory Analytical Methods</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soil</td>
<td>pH</td>
<td>U.S. EPA 9045D</td>
</tr>
<tr>
<td></td>
<td>Ignitability</td>
<td>U.S. EPA 1010A</td>
</tr>
<tr>
<td></td>
<td>Reactivity</td>
<td>Sec. 7.3.3, 7.3.4, and 8.3 (Delisted, no longer part of SW-846)</td>
</tr>
<tr>
<td></td>
<td>RCRA F and D-List TCLP and Total VOCs</td>
<td>U.S. EPA 8260D</td>
</tr>
<tr>
<td></td>
<td>RCRA F and D-List TCLP and Total SVOCs</td>
<td>U.S. EPA 8270E</td>
</tr>
<tr>
<td></td>
<td>RCRA F and D-List TCLP and Total Metals</td>
<td>U.S. EPA 6020B and 7470A/7471B</td>
</tr>
</tbody>
</table>

Notes:

RCRA – Resource Conservation and Recovery Act
TCLP – Toxicity Characteristic Leaching Procedure (preparation method 1311 or 1312)
<table>
<thead>
<tr>
<th>QC Parameter</th>
<th>DQO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Precision</td>
<td>Relative percent difference (RPD) of field and laboratory duplicate (MS/MSD) samples. For laboratory duplicates, the RPDs within established laboratory control limits for each analyte are acceptable. For soil and indoor air field duplicates, a calculated RPD of 50% will be deemed acceptable. For groundwater field duplicates, a calculated RPD of 20% will be deemed acceptable.</td>
</tr>
<tr>
<td>Accuracy</td>
<td>Spike recoveries from laboratory control samples (LCSs), MS/MSDs, and surrogates within established laboratory control limits for each analyte are acceptable.</td>
</tr>
<tr>
<td>Representativeness</td>
<td>Environmental samples will be collected from locations either reasonably believed to be, or established to be, representative to identify source areas, evaluate the nature of the release(s), and delineate the extent of contamination. Standard field operating procedures will be used, method blanks are to be free of target analytes, sample holding times are not to be exceeded, all samples are to be properly preserved, receiving temperatures are not to be exceeded, 90% of all field duplicates meet laboratory precision criteria, and laboratory method detection limits must be below the applicable screening levels.*</td>
</tr>
<tr>
<td>Completeness</td>
<td>An acceptable level of completeness will be defined as 85% of collected samples being deemed valid based on precision, accuracy, representativeness, and comparability acceptance criteria.</td>
</tr>
<tr>
<td>Comparability</td>
<td>Where feasible (where previous data exist as with monitoring wells), analytical results for environmental samples will be compared to previous analyses for the respective location. Measures of comparability will include the use of standard analytical methods with standard units of measure and consistent reporting limits, and collection of field QC samples.</td>
</tr>
</tbody>
</table>

* The representativeness has been established requiring that 90% of all field duplicates meet the established precision criteria and detection limits will be below applicable screening levels; however, if sample dilution occurs because of elevated analyte concentrations, the results will not be rejected.
<table>
<thead>
<tr>
<th>Environmental Media (Matrix)</th>
<th>MS/MSD</th>
<th>Field Duplicate</th>
<th>Equipment Blank</th>
<th>Trip Blank</th>
<th>Split Samples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soil</td>
<td>A minimum of 1 per sample delivery group, all analytes, or 1 per 20 environmental samples, whichever is greater</td>
<td>1 per 10 environmental samples, all analytes, minimum of 1 per sampling event</td>
<td>1 per 20 environmental samples, all analytes, only if non-dedicated sampling equipment is used</td>
<td>1 in each cooler containing VOC samples (not expected to be used)</td>
<td>At discretion of DWMRC</td>
</tr>
</tbody>
</table>
Figures
Figure 2
Current Property Use Map

Groundwater Flow Direction (Inferred)

SILOS SOUTH APARTMENTS
WEI 2439-014C

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Figure 3
Facility Feature Map

Groundwater Flow Direction (Inferred)

Approximate Location of Facility

500 South

600 South
Appendix A

Standard Operating Procedures
SOP 1 – SITE ACCESS AND PERMITS

Utility clearance will be requested through Blue Stakes of Utah prior to commencement of any sampling activities that will require excavation or drilling. Depending on the configuration of the project site, Wasatch may have a private utility locate performed in addition to Blue Stake clearance.

All necessary plans and permits (i.e., traffic control plans, right of way encroachment permits, etc.) will be obtained by Wasatch prior to commencement of any sampling activities.

Access agreements will be obtained with the owners, occupants, or lessees of any off-site properties prior to commencement of sampling activities to be conducted on any off-site properties. Access agreements will be in writing.

Start cards will be obtained through the State of Utah Department of Natural Resources, Division of Water Rights, for any monitoring wells that will extend to depths of 30 feet or greater.
SOP 3 – EQUIPMENT AND MATERIALS

Equipment used in the execution of field activities will be inspected, maintained, and calibrated by Wasatch field personnel per manufacturer’s instructions. All field equipment will be inspected before and after each use. Equipment requiring calibration will be calibrated, according to the manufacturer’s instructions, before each use. Field equipment will be recalibrated as necessary if field readings appear to be abnormal. Equipment calibration will be documented in field notes or on an equipment calibration log. Any reusable field equipment that will come into contact with sampled environmental media will be decontaminated before each use. Equipment that repeatedly malfunctions or is significantly damaged will be removed from service, and a replacement provided, until it has been properly repaired.

The following equipment may be used during investigation activities:

- **Photoionization Detector (PID)** – will be used to monitor the atmosphere for volatile organic compounds (VOCs) and to field screen soil cores for VOCs.
- **Lower Explosive Limit (LEL)/Multi Gas Meter** – will be used to monitor oxygen and explosive gas levels in the atmosphere and in underground storage tanks (USTs) during UST removals.
- **Personal Protective Equipment (PPE)** – will be used in accordance with the site-specific health and safety plan (HASP). Field personnel will be equipped with protective clothing, gloves, hearing protection, eye protection, respiratory protection, safety glasses, safety-toed boots, and hard hats as dictated by site conditions and the HASP. At a minimum level D PPE will be used during all field activities.
- **Decontamination Supplies** – will be used to clean and decontaminate sampling equipment and personnel. Decontamination supplies includes items such as, but not limited to, Alconox®, Liquinox®, buckets, brushes, spray bottles, pressure washers, paper towels, potable water, distilled water, and deionized water.
- **Disposable Bailers** – will be used for collecting groundwater samples from monitoring wells and piezometers. Disposable bailers may also be used for the removal of light non-aqueous phase liquids (LNAPL) from monitoring wells and piezometers, and during the development process of monitoring wells and piezometers.
- **Multi-parameter Water Quality Meters** – will be used to measure temperature, specific conductivity, oxidation-reduction potential (ORP), dissolved oxygen (DO), pH, and turbidity while purging groundwater from monitoring wells prior to collecting groundwater samples. Stabilization of these measured parameters indicates when the purged water is representative of the groundwater within the aquifer and; therefore, when it is appropriate to collect a groundwater sample for laboratory analysis.
- **Water Level Indicators** – will be used to measure depth to groundwater in monitoring wells and piezometers.
- **Interface Probes** – will be used to measure the depth to light non-aqueous phase liquids (LNAPL), depth to dense non-aqueous phase liquids (DNAPL) and depth to groundwater in monitoring wells and piezometers.
- **Data Loggers and Transducers** – will be used to measure changes in groundwater levels during aquifer tests such as slug tests and pump tests.
- **Slugs** – made of stainless steel or polyvinyl chloride (PVC) pipe and weighted with sand or cement, will be used to induce fluctuations in groundwater levels for slug tests.
- **Summa Canisters/Tedlar Bags and Flow Regulators** – Summa canisters of various sizes equipped with flow regulators will be used for collecting soil gas, sub-slab soil gas, indoor air, and background outdoor air samples for laboratory analysis of VOCs. Additionally, tedlar bags may be used to sample vapor when a pumping apparatus is present in lieu of the Summa canisters.
- **Vapor Pins** – will be used to create sampling points for the collection of sub-slab soil gas samples.
• **AQR Color-Tec® Tubes** - AQR Color-Tec® tubes will be used to field screen soil gas and groundwater for VOCs.

• **Measuring Devices** – include tape measures, measuring wheels, global positioning systems (GPS), total stations, transits, levels, and rods. These devices will be used to locate and map the locations and dimensions of site features and sampling locations, and to measure top of casing elevations of monitoring wells and piezometers.

• **Monitoring Well Construction materials** – will consist of Schedule 40 or 80 PVC or stainless steel casing, machine slotted continuous wire wrapped well screen, and well foot; lockable well caps; traffic rate well vaults; monument well boxes; silica sand; bentonite; grout/neat cement; and concrete.

• **Split-Spoon Samplers and Continuous Core Samplers** – will be used to collect soil samples, with minimal disturbance to the soil, during drilling activities. The soil samples may be collected for logging subsurface conditions, field screening, and/or laboratory analysis.

• **Pumps and Ancillary Sampling Equipment** – including peristaltic pumps, down-well electric pumps (such as Grundfos pumps), down-well pneumatic pumps (such as bladder pumps), pump controllers, tubing, groundwater filters, stainless steel bowls, stainless steel sample trowels, and hand augers will be used as appropriate for various sampling activities.

• **Drill Rigs** – such as direct-push, cone penetrometer, hollow-stem auger, ODEX, air rotary, and sonic rigs will be used as appropriate for advancing exploratory borings, collecting soil and groundwater samples, and installing monitoring wells and piezometers. Drill rigs will be supplied and operated by subcontractors with direction and oversight from Wasatch Environmental, Inc. Drilling subcontractors will be required to provide their own PPE and decontamination equipment, and required to comply with the HASP created by Wasatch.

• **Cutting and Coring Equipment** – will be used to cut or core through concrete and asphalt to allow access for drilling and sampling.

• **Hand/Power Tools** – including, but not limited to, hammers, drills, saws, screw drivers, wrenches, etc., will be used with caution and only for the intended purposes of each piece of equipment.

• **Soil Gas Sampling Probe** – The probe consists of a slide hammer, metal rods, and drive points. Prior to each use all connections will be inspected and verified tight, and all equipment that comes in contact with environmental media will be decontaminated prior to use.
SOP 4 – EQUIPMENT CALIBRATION

All field equipment calibrations will be conducted according to manufacturer's instructions and noted in the field logbook. The water quality meter, PID, and multi-gas meter will be calibrated with known standards prior to use, and as recommended by the manufacturer’s instructions throughout the sampling activities. The equipment will be calibrated multiple times a day if deemed necessary based on suspect readings. Calibration standard lot numbers and expiration dates (when applicable) will be recorded in the field logbook or documented on equipment calibration form.
SOP 5 – DECONTAMINATION

Equipment used to advance soil borings, and obtain soil and groundwater samples, will be decontaminated to avoid cross-contamination. Downhole equipment will be pressure-cleaned with potable water and Alconox® (or other equivalent cleaner) before drilling and sampling of each borehole. The cleaning of equipment will typically be performed at the site.

Bailers, submersible pumps and other non-dedicated miscellaneous equipment, that contacts analytical soil or groundwater samples, will be decontaminated or replaced with new material before and between each sampling event. Equipment of this type may be decontaminated by cleaning, when convenient, but is typically decontaminated using the following three-step procedure:

- Laboratory-grade detergent, such as Alconox®, and potable water wash
- Potable water rinse
- Triple rinse with distilled water or deionized water

Spray bottles may be used to store and apply the distilled or deionized water. If necessary, sampling equipment will be wrapped with aluminum foil to protect the equipment from dust or vapors between use. Liquids generated during the decontamination process will be handled according to the Management of Investigation-Derived Waste SOP when required.
SOP 6 – MANAGEMENT OF INVESTIGATION-DERIVED WASTE

Investigation-derived waste (IDW) generated during investigation operations will include sanitary waste (label backs, paper towels, etc.), used personal protection equipment (PPE), soil cuttings, decontamination water, purge water, and well development water.

Container Management and Labeling

Waste containers will be identified with the solid waste origination location(s), boring and/or sampling location(s), and date generated. The information will be written directly on the containers or written on labels that are affixed to the containers. If labels are used, labels indicating “Analysis Pending” will be affixed to each drum until such time as the waste has been properly characterized. Once the waste has been characterized, the “Analysis Pending” label will be replaced with either a “Non-Hazardous Waste” label or a “Hazardous Waste” label, as appropriate. If a “Hazardous Waste” label is used, the label will be fill-out completely including the appropriate waste code(s) and generator information. Hazardous waste will be stored in a secured area with appropriate signage, and will be properly transported and disposed within 90 days of generation. All hazardous waste containers will be photographed after they have been characterized, identified, labeled, and stored to document proper labeling and storage. These data will be documented in a field notebook, by field personnel. The containerized IDW will be inspected as deemed necessary to ensure that the integrity of the containers is maintained and that the material has not been removed from the designated storage location.

Sanitary Waste and Personal Protective Equipment

Sanitary wastes, including used PPE generated at each investigation location, will be collected in plastic bags or equivalent containers and sealed. The waste will be disposed as municipal waste. As necessary, soil and loose material will be brushed off or otherwise removed from the PPE at the site before containerizing the PPE.

Soil Cuttings

Soil cuttings will be placed in 55-gallon drums and left on-site pending analytical results. The concentrations of soil within the containers will be determined using the soil sample data from the soil boring locations or by waste characterization sampling from the drums. Soil concentrations will be used to determine if the containerized soil must be transported off-site for disposal, or if the soil may be disposed on-site.

Decontamination Fluids, Purge Water, and Development Water

The accumulation area for decontamination water, purge water, and well development water will be located on-site. The water will be containerized and stored in areas preferably out of sight from the general public. Analytical data associated with the generation of the IDW water, historical data for the locations associated with the IDW, or waste characterization samples will be reviewed or collected to determine the appropriate disposal options for the IDW.
SOP 7 – DOCUMENTATION

Documentation guidelines are intended to ensure that complete and consistent written records are maintained throughout the field activities. The field documents will be reviewed for accuracy and will remain available to field personnel at the site, during field activities. In addition, photographs will be taken in the field to document activities and conditions.

All field activities will be recorded in field notebooks. Notebooks will contain descriptions of daily field activities. Information to be recorded in logbooks includes the following, as appropriate:

- Photoionization detector readings, odors, and other readings pertaining to air quality
- Quality assurance and quality control sample identification
- Daily site conditions including temperature and weather
- Personnel present on-site, including time that they entered the site
- Calibration information
- Subcontractor activities
- Samples collected
- Well development
- Descriptions of field tests
- Equipment used
- Decontamination procedures
- Problems encountered
- Decisions
- Phone records
- Chain-of-custody information

Notebook entries will be made with ink. Corrections will be made by drawing a single line through the entry, initialing, and dating the revision if necessary.

Some field data will be recorded on the specialized forms. These data will typically not be duplicated in the field logbooks; however, reference to the forms will be recorded in the logbooks, as appropriate.
SOP 8 – SURVEYING OF SAMPLE LOCATIONS

Monitoring wells and piezometers will be topographically surveyed by a Utah Licensed surveyor using established vertical and horizontal control points.

The casing and ground surface elevation for monitoring wells will be surveyed by a Utah licensed surveyor to within ±0.01 feet using the current industry accepted vertical datum. The top of the casing (not protective case) for monitoring wells and the ground surface will be surveyed. Horizontal coordinates will be determined to within ±0.1 feet and reported in coordinates that are specified in the work plan.

Survey field data (as corrected) for monitoring wells will include loop closure for survey accuracy and raw survey data. Closure will be within the horizontal and vertical limits given above. This submission will clearly list the coordinates (and system) and elevation (ground surface and/or top of well casing, as appropriate) for all borings, wells, and reference marks. All permanent and semi-permanent reference marks used for horizontal and vertical control (bench marks, caps, plates, chiseled cuts, rail spikes, etc.) will be described in terms of their name, character, and physical location.

The on-site representative will be responsible for coordinating the survey crew activities but may or may not conduct oversight or supervision of the survey crew while field work is conducted. A set of keys will be supplied to the survey crew by Wasatch or the client to allow access to any locked gate or monitoring wells. The survey crew will return the keys to the on-site representative or client after survey work is completed.

The surveying of other types of sample locations will be conducted as needed. Other types of sample locations may include soil boring locations, surface water sampling, sediment sampling locations, and shallow/surface soil sampling locations. The surveying requirements for these types of sample locations are similar to the requirements for surveying monitoring wells. However, there will be no top-of-casing elevation and the accuracy for ground surface elevation measurement will be to within ±0.1 feet rather than ±0.01 feet. Some sample grids and locations may be located by Wasatch field personnel using a sub-meter grade global positioning system (GPS) or laser surveying equipment, as specified in works plans and/or sampling and analysis plans.
SOP 9 – SAMPLE DOCUMENTATION AND HANDLING

Sample collection information will be entered into field notebooks. Prior to laboratory shipment, each sample will be logged on a Chain-of-Custody (COC) Form. The COC form will be placed in a cooler and will accompany the analytical samples during shipment or transport to the laboratory.

Once sealed, sample bottles will be labeled and placed in an iced cooler. Coolers to be shipped via courier will be lined with a plastic bag and packed with packing material surrounding the bottles to prevent breakage during shipment. Additionally, the drain spout of the cooler will be taped shut. Ice will be sealed in plastic bags to prevent melted ice from soaking the packing material. A temperature blank may be included in each cooler. A COC form will be enclosed in sealed plastic bags and taped to the underside of the cooler lid. Coolers will be secured with strapping tape and custody seals. The custody seals will be affixed to each sample cooler (not each bottle). The coolers will be shipped or delivered to the appropriate laboratory, by the field technician or overnight courier, so they will arrive for analysis within 3 days of sample collection.
SOP 10 – CHAIN-OF-CUSTODY DOCUMENTATION

A required part of any sampling and analytical program is a system for sample control from collection to data reporting. This includes the ability to trace the possession and handling of samples from the time of collection through analysis and final deposition. This system also ensures against tampering or contamination of samples. The documentation of the sample’s history is referred to as the chain of custody (COC). Initially after collection, a sample is considered to be under a person’s custody if it fits the following criteria:

- In an individual’s possession
- In view of the individual after that person has taken possession
- Secured by the person so that no one can tamper with the sample

The field technician will use COC forms that are equivalent to the U.S. EPA Office of Enforcement COC forms. The sequence for transferring samples from the possession of the sampler, as cited above, to the contract laboratory is as follows:

When the sample bottles are delivered from the laboratory, both the sender and receiver sign and date the COC form as well as specifying on the form what has changed hands. From that point on, every time the sample bottles change hands (whether empty or full) both parties sign and date the transfer. However, some sample bottles are stored at Wasatch and no COC is required for the acquisition of the sample bottles.

The following information is included on the COC:

- Project number
- Project name
- Sample ID number (as noted in the field log book) secured by that person so no one can tamper with the sample
- Signature of sampler
- Date and time of collection (time logged in field log book)
- Type and matrix of sample
- Number of containers
- Preservative
- Requested analyses
- Inclusive dates of possession
- Signature of receiver

In addition to the COC form, other components of the COC will include sample labels, custody seals (if shipping the samples to a laboratory), and field notebook, as summarized below:

Sample Label. A sample label will be affixed to each sample bottle to provide information regarding the sample ID, sampler’s initials, analytical tests to be performed, preservative information, date, and time of sample collection.

Custody Seals. Two custody seals will be affixed to each sample shipping container (not each bottle). These seals will show a sampler’s (or person in possession of the samples) name, and date sealed. The seals will be taped onto the sample shipping container or lid of the shipping container prior to sample shipment, and will be broken at the laboratory under COC procedures.
ATTACHMENT D: Plan Set
SITE SUMMARY
Zoning: General Commercial (CG)

BUILDING 1
5 Levels Type IIIA over 1 Level Type IA
65 DU
6,740 SF Ground Level Commercial

BUILDING 2
EXISTING COMMERCIAL BUILDING
LEVEL 2 & 3 AMENITY
 LEVEL 3 COMMERCIAL
 LEVEL 2 CANOPY 4' x 0" x 4'
 LEVEL 3 PATIO 6' x 3" x 21'

BUILDING 3
5 Levels Type IIIA over 1 Level of Type IA
221 DU
4,710 SF Ground Level Amenity
2,200 SF Ground Level Leasing Office
5,880 SF Level 2 Amenity
810 SF Level 3 Amenity
1,310 SF Level 6 Amenity

*All buildings above grade
**SITE SUMMARY**

Zoning: General Commercial (CG)

**BUILDING 1**
5 Levels Type IIIA over 1 Level Type IA
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6,740 SF Ground Level Commercial

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221 DU
4,710 SF Ground Level Amenity
2,200 SF Ground Level Leasing Office
5,880 SF Level 2 Amenity
810 SF Level 3 Amenity
1,310 SF Level 6 Amenity
*All buildings above grade*
BLDG 1 - LEVEL 1
(+4232.5)
4232'-6"

BLDG 1 - LEVEL 2
16'-6"

BLDG 1 - LEVEL 3
27'-0"

BLDG 1 - LEVEL 4
37'-6"

BLDG 1 - LEVEL 5
48'-0"

BLDG 1 - LEVEL 6
58'-6"

BLDG 1 - ROOF
69'-0"

Note: Final material color, opening locations, and specification to be issued upon Building Permit Submittal.
UNIT S3.4
STUDIO
AVG. NET RENTABLE AREA: 327 SF
AVG. MARKET AREA: 364 SF
IN BLDG 1 LEVELS 2-6

UNIT S8
STUDIO
AVG. NET RENTABLE AREA: 386 SF
AVG. MARKET AREA: 442 SF
IN BLDG 3 LEVELS 2-6

UNIT S2 & S2.1 SIM.
STUDIO
AVG. NET RENTABLE AREA: 486 SF
AVG. MARKET AREA: 562 SF
UNIT COUNT: 15 - 3.2%
IN BLDG 3 LEVEL 2-6
UNIT A6
1-BED/1-BA
AVG. NET RENTABLE AREA: 678 SF
AVG. MARKET AREA: 766 SF
UNIT COUNT: 3 - 1%
IN BLDG. 3 LEVEL 1

UNIT A8
1-BED/1-BA
AVG. NET RENTABLE AREA: 718 SF
AVG. MARKET AREA: 784 SF
UNIT COUNT: 4
IN BLDG. 3 LEVELS 3-6

UNIT A2
1-BED/1-BA
AVG. NET RENTABLE AREA: 738 SF
AVG. MARKET AREA: 784 SF
UNIT COUNT: 1 - 0.2%
IN BLDG. 3 LEVEL 1
UNIT A3
1 BED / 1 BA
AVG. NET RENTABLE AREA: 664 SF
AVG. MARKET AREA: 725 SF
IN BLDG: 3 LEVELS 2-6
UNIT A4.1
1 BED/1 BA
AVG. NET RENTABLE AREA: 588 SF
AVG. MARKET AREA: 639 SF
UNIT COUNT: 4 - 1.2%
IN BLDG. 3 LEVELS 3-6

UNIT A7 TYPE A
1 BED/1 BA
AVG. NET RENTABLE AREA: 842 SF
AVG. MARKET AREA: 897 SF
UNIT COUNT: 1 - 0.3%
IN BLDG. 3 LEVEL 1
SILOS SOUTH APARTMENTS
SALT LAKE CITY, UT 84101
PLANNED DEVELOPMENT + DESIGN REVIEW
MVE + PARTNERS
1900 MAIN STREET, SUITE 800
IRVINE, CA 92614
PHONE: 949.809.3388
SILOS SOUTH APARTMENTS, LLC
2170 S MCCLELLAND ST, SUITE 100
SALT LAKE CITY, UT 84106
PHONE: 801.582.3188

Perspective A5-3
06/02/2023
Lighting is conceptual in nature. Final Lighting Design will be determined during the Permit Process. All lighting is intended to comply with Standard K of SLC Design Review.
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ATTACHMENT E: Property Photos

Miller Building along 600 S

Casket Building along 600 S

Existing concrete pad along 500 W

Proposed site of Building 1, southeast corner at the intersection of the midblock walkways
Existing building on 400 W is north of building 2 & east of building 1. Not part of the block development and will remain as is.
Proposed location of a midblock walkway, looking east from the middle of the block.

Proposed location of a midblock walkway, looking west from 400 W.

Proposed location of a midblock walkway, looking south from the middle of the block.

Proposed location of a midblock walkway, looking north from 600 S.
21A.26.070: CG GENERAL COMMERCIAL DISTRICT

<table>
<thead>
<tr>
<th>Standard</th>
<th>Proposed</th>
<th>Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Maximum Height:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No building shall exceed 60’. Buildings higher than 60’ may be allowed in accordance with the provisions of subsections F1 and F3 of this section.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>F1: A modification to the height regulations may be granted through the design review process. In evaluating the application, the Planning Commission shall find that the increased height will result in improved site layout and amenities.</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>Building 2: 85’</td>
<td>The increased height will result in an improved site layout and amenities by providing additional space for midblock walkways and outdoor amenities. See Consideration 2 for a complete analysis.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Complies.</strong></td>
</tr>
<tr>
<td><strong>Minimum lot area:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10,000 SF</td>
<td>Building 1: 20,642 SF</td>
<td><strong>Complies.</strong></td>
</tr>
<tr>
<td></td>
<td>Building 2: 88,793 SF</td>
<td></td>
</tr>
<tr>
<td><strong>Minimum lot width:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>60’</td>
<td>Lot 1: 123’</td>
<td><strong>Complies.</strong></td>
</tr>
<tr>
<td></td>
<td>Lot 2: 342’</td>
<td></td>
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<tr>
<td><strong>Front, Corner Side, and Rear Yards:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10’</td>
<td>Building 1</td>
<td>Building 1: <strong>Complies</strong></td>
</tr>
<tr>
<td></td>
<td>Front: 10’</td>
<td>Building 2: <strong>Does not comply</strong></td>
</tr>
<tr>
<td></td>
<td>Rear: 15’</td>
<td>The reduced corner side yard requires planned development approval.</td>
</tr>
<tr>
<td></td>
<td>Building 2</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Front: 10’</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Corner: 0’</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Rear: 60’</td>
<td></td>
</tr>
<tr>
<td><strong>Interior Side Yards:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>None required</td>
<td>Building 1</td>
<td><strong>Complies.</strong></td>
</tr>
<tr>
<td></td>
<td>Side: 5’ &amp; 14’</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Building 2</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Side: 44’</td>
<td></td>
</tr>
<tr>
<td><strong>Buffer Yards:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>All lots abutting property in a Residential District shall conform to the buffer yard requirement of chapter 21A.48 of this title.</td>
<td>Lot does not abut property in a Residential District.</td>
<td><strong>Complies.</strong></td>
</tr>
</tbody>
</table>
## OTHER APPLICABLE STANDARDS

<table>
<thead>
<tr>
<th>Standard</th>
<th>Proposed</th>
<th>Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>21A.36.010.C – Frontage of Lot on Public Street</strong>&lt;br&gt;All lots shall front on a public street unless specifically exempted from this requirement by other provisions of this title.</td>
<td>Building 1&lt;br&gt;The lot and building do not have public street frontage.&lt;br&gt;Building 2&lt;br&gt;The lot and building have street frontage along 400 W and 600 S.</td>
<td>Building 1: <strong>Does not comply.</strong> Planned Development requested.&lt;br&gt;Building 2: <strong>Complies.</strong></td>
</tr>
<tr>
<td><strong>Table 21A.36.020B – Obstructions in Required Yards</strong>&lt;br&gt;Awnings and canopies, extending not more than 2.5 feet into front, corner side, or side yards and not more than 5 feet into rear yards allowed in residential districts only.&lt;br&gt;Balconies projecting not more than 5 feet permitted in the rear yard only.</td>
<td>Building 1&lt;br&gt;There are no obstructions or building projections into required yards.&lt;br&gt;Building 2&lt;br&gt;Ground floor awnings along 400 W extend into the front setback by 4’. Upper floor balconies extend 4’-3” into the same setback.</td>
<td>Building 1: <strong>Complies.</strong>&lt;br&gt;Building 2: <strong>Does not comply.</strong> Planned Development requested.</td>
</tr>
<tr>
<td><strong>21A.37.050.D – Building Entrances</strong>&lt;br&gt;At least one operable building entrance on the ground floor is required for every street facing façade.</td>
<td>Building 1&lt;br&gt;This building has 4 commercial entrances facing the park and 1 residential entrance facing the private street/midblock walkway.&lt;br&gt;Building 2&lt;br&gt;The 400 W façade has 8 ground floor unit entrances and 2 building entrances.&lt;br&gt;The 600 S façade does not have a ground floor building entrance.</td>
<td>Building 1: <strong>Complies.</strong>&lt;br&gt;Building 2: <strong>Does not comply,</strong> planned development approval required for the 600 S façade.</td>
</tr>
<tr>
<td><strong>Table 21A.44.40-A – Off Street Parking</strong>&lt;br&gt;Residential&lt;br&gt;Studio &amp; 1-bedroom: 1 space per DU&lt;br&gt;2+ bedroom: 1.25 spaces per DU&lt;br&gt;Commercial&lt;br&gt;Retail/restaurant: 2 spaces per 1000 SF&lt;br&gt;Off-site parking is permitted provided it is within 600’ of the use and under the same ownership.&lt;br&gt;Shared parking between retail and multi-family uses may be reduced by a factor of 1.2.</td>
<td>Secure/enclosed parking: <strong>185</strong>&lt;br&gt;Surface parking lot: <strong>181</strong>&lt;br&gt;Total provided parking: <strong>366</strong>&lt;br&gt;52 studio units: <strong>52</strong>&lt;br&gt;133 1-bedroom units: <strong>133</strong>&lt;br&gt;101 2-bedroom units: <strong>126</strong>&lt;br&gt;Total residential: <strong>311</strong>&lt;br&gt;17,566 SF total retail: <strong>35</strong>&lt;br&gt;Shared parking reduction: (311 + 35) / 1.1 = <strong>315</strong>&lt;br&gt;Minimum Spaces Required: <strong>295</strong></td>
<td><strong>Complies</strong>&lt;br&gt;Note: The surface parking lot will be required to meet all applicable standards at the time of permitting.</td>
</tr>
<tr>
<td>Code</td>
<td>Requirement</td>
<td>Result</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>------------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td><strong>21A.44.040.C – Electric Vehicle Parking</strong></td>
<td>1 space for every 25 parking spaces</td>
<td>16 spaces</td>
</tr>
<tr>
<td></td>
<td></td>
<td>366 / 25 = 15</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Complies</td>
</tr>
<tr>
<td><strong>21A.44.040.E – Bicycle Parking</strong></td>
<td></td>
<td>33 spaces</td>
</tr>
<tr>
<td></td>
<td>1 per 5 residential units</td>
<td>within Building 2.</td>
</tr>
<tr>
<td></td>
<td>1 per 10,000 SF commercial space</td>
<td>286 units / 5 = 57</td>
</tr>
<tr>
<td></td>
<td>Each enclosed/secure bicycle space may count toward 2 required spaces</td>
<td>17,566 SF = 2</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Enclosed/secure spaces: 30</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Complies</td>
</tr>
</tbody>
</table>
ATTACHMENT G: Design Review and Planned Development Standards

21A.59.050: Standards for Design Review: In addition to standards provided in other sections of this title for specific types of approval, the following standards shall be applied to all applications for design review:

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

<table>
<thead>
<tr>
<th>A. Any new development shall comply with the intent of the purpose statement of the zoning district and specific design regulations found within the zoning district in which the project is located as well as the City's adopted &quot;urban design element&quot; and adopted master plan policies and design guidelines governing the specific area of the proposed development.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Finding:</strong> Complies</td>
</tr>
<tr>
<td><strong>Discussion:</strong> See Consideration 1 for the discussion of zoning district purposes, master plan guidelines, and urban design elements.</td>
</tr>
<tr>
<td><strong>Condition(s):</strong> none</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>B. Development shall be primarily oriented to the sidewalk, not an interior courtyard or parking lot.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Primary entrances shall face the public sidewalk (secondary entrances can face a parking lot).</td>
</tr>
<tr>
<td>2. Building(s) shall be sited close to the public sidewalk, following and responding to the desired development patterns of the neighborhood.</td>
</tr>
<tr>
<td>3. Parking shall be located within, behind, or to the side of buildings.</td>
</tr>
<tr>
<td><strong>Finding:</strong> Complies</td>
</tr>
<tr>
<td><strong>Discussion:</strong> Building 1 is oriented to the park and private mid-block streets with entrances on all building facades that face the privately owned public spaces. Building 2 is surrounded by public and private rights-of-way and features multiple building and private unit entrances on 3 of the 4 facades. The 600 S façade ground floor façade includes multiple windows into the 2 units on that level but the applicant has elected to orient the unit entrances toward the side streets. This was done due to the block’s proximity to the 600 S overpass from I-15 which features 7 lanes of one-way traffic that is reducing from highway to city speeds along this stretch of the street. The presence of that overpass</td>
</tr>
</tbody>
</table>

June 28, 2023
makes this block unhospitable to pedestrians and therefore the unit entrances were oriented toward 400 W and the midblock street which are more pedestrian oriented streets.

The surrounding area of this project is slowly developing from an industrial to more urban area. The existing development pattern is not very dense, and portions of existing buildings are often not built close to the sidewalk. The proposed development will be sited close to the sidewalk, both public and private, to engage the pedestrian and will more closely comply with the desired development patterns for the neighborhood as described in the Downtown Master Plan and the city’s Urban Design Element.

Parking for the project will be provided in Building 2’s parking garage and in an off-site surface parking lot and retrofitted warehouse on the southwest corner of the block. Surface parking lots are a permitted land use in the CG zone and it will be required to meet all of the landscaping and buffering standards in 21A.48.

**Condition(s): none**

**C. Building facades shall include detailing and glass in sufficient quantities to facilitate pedestrian interest and interaction.**

1. Locate active ground floor uses at or near the public sidewalk.
2. Maximize transparency of ground floor facades.
3. Use or reinterpret traditional storefront elements like sign bands, clerestory glazing, articulation, and architectural detail at window transitions.
4. Locate outdoor dining patios, courtyards, plazas, habitable landscaped yards, and open spaces so that they have a direct visual connection to the street and outdoor spaces.

**Finding:** Complies

**Discussion:**

1. Each building includes active ground floor uses including amenity and commercial spaces.
2. The ground floor façades include adequate glazing to facilitate pedestrian interaction.
3. The active ground floor uses employ a variety of traditional elements including sign columns, clerestory glazing, and architectural details.
4. Each building features elements of open space, i.e. outdoor dining, patios, plazas, etc., that connect physically and/or visually to the street.

Each building is discussed in detail in Consideration 2.

**Condition(s): none**

**D. Large building masses shall be divided into heights and sizes that relate to human scale.**

1. Relate building scale and massing to the size and scale of existing and anticipated buildings, such as alignments with established cornice heights, building massing, step-backs and vertical emphasis.
2. Modulate the design of a larger building using a series of vertical or horizontal emphases to equate with the scale (heights and widths) of the buildings in the context and reduce the visual width or height.
3. Include secondary elements such as balconies, porches, vertical bays, belt courses, fenestration and window reveals.
4. Reflect the scale and solid-to-void ratio of windows and doors of the established character of the neighborhood or that which is desired in the master plan.

**Finding:** Complies

**Discussion:**
1. Each building uses building massing, step-backs, and various vertical modulation in consideration of the surrounding structures.
2. Vertical and horizontal modulations are used to reduce the visual width and height of the two buildings.
3. Each building features balconies, porches, varied fenestration patterns, and window reveals that divide up the height and scale of the structures.
4. The scale and solid to void ratio of windows and doors are in character with existing buildings in the neighborhood as well as consistent with what is desired in the Downtown Master Plan.

This is further discussed in Consideration 2.

**Condition(s):** none

**E. Building facades that exceed a combined contiguous building length of two hundred feet (200’) shall include:**

1. Changes in vertical plane (breaks in facade)
2. Material changes; and
3. Massing changes.

**Finding:** Complies

**Discussion:**
The west and east facades of Building 2 exceed 200’ of building length. They both feature numerous changes in the vertical plane, separated masses, and a variety of materials to reduce the impact of the building length.

Details are discussed in Consideration 2.

**Condition(s):** none

**F. If provided, privately-owned public spaces shall include at least three (3) of the six (6) following elements:**

1. Sitting space of at least one sitting space for each two hundred fifty (250) square feet shall be included in the plaza. Seating shall be a minimum of sixteen inches (16") in height and thirty inches (30") in width. Ledge benches shall have a minimum depth of thirty inches (30");
2. A mixture of areas that provide seasonal shade;
3. Trees in proportion to the space at a minimum of one tree per eight hundred (800) square feet, at least two inch (2") caliper when planted;
4. Water features or public art;
5. Outdoor dining areas; and
6. Other amenities not listed above that provide a public benefit.

**Finding:** Complies With Conditions

**Discussion:**
This project features two mid-block walkways as identified in the Downtown Master Plan. These will be privately-owned public spaces and recorded as an easement through a development agreement with the city. The applicant is proposing to include sitting spaces, areas with season shade, outdoor dining areas, and public art. The final design and placement of these elements is proposed to be delegated to planning staff as a condition of approval.

**Condition(s):** Final approval of the details for required elements within privately-owned public spaces to be delegated to Planning Staff to ensure compliance with the standards for Design Review.

G. Building height shall be modified to relate to human scale and minimize negative impacts. In downtown and in the CSHBD Sugar House Business District, building height shall contribute to a distinctive City skyline.

1. Human scale:
   a. Utilize stepbacks to design a building that relate to the height and scale of adjacent and nearby buildings, or where identified, goals for future scale defined in adopted master plans.
   b. For buildings more than three (3) stories or buildings with vertical mixed use, compose the design of a building with distinct base, middle and top sections to reduce the sense of apparent height.

2. Negative impacts:
   a. Modulate taller buildings vertically and horizontally so that it steps up or down to its neighbors.
   b. Minimize shadow impacts of building height on the public realm and semi-public spaces by varying building massing. Demonstrate impact from shadows due to building height for the portions of the building that are subject to the request for additional height.
   c. Modify tall buildings to minimize wind impacts on public and private spaces, such as the inclusion of a wind break above the first level of the building.

3. Cornices and rooflines:
   a. Cohesiveness: Shape and define rooflines to be cohesive with the building’s overall form and composition.
   b. Complement Surrounding Buildings: Include roof forms that complement the rooflines of surrounding buildings.
   c. Green Roof And Roof Deck: Include a green roof and/or accessible roof deck to support a more visually compelling roof landscape and reduce

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**Finding:** Complies

**Discussion:**

1. The height of each building has been modified to relate to human scale through step-backs and a well-designed base, middle, and top.
2. There is no anticipated negative impact with the height of these buildings. Each has been modulated both vertically and horizontally to reduce the impact of that height on the neighboring structures and public spaces. The shadow report shows neither building to have a substantial impact.
3. Each building features unique rooflines that create a cohesive design and form. This is discussed further in Consideration 2.

**Condition(s):** none

**H. Parking and on site circulation shall be provided with an emphasis on making safe pedestrian connections to the sidewalk, transit facilities, or midblock walkway.**

**Finding:** Complies

**Discussion:**

Structured and surface parking will provided for the site. The interior streets will have curb and gutter with street trees to clearly define pedestrian and vehicular spaces. Changes in materials and landscape features will help create a safe environment for pedestrians.

**Condition(s):** none

**I. Waste and recycling containers, mechanical equipment, storage areas, and loading docks shall be fully screened from public view and shall incorporate building materials and detailing compatible with the building being served. Service uses shall be set back from the front line of building or located within the structure. (See subsection 21A.37.050K of this title.)**

**Finding:** Complies With Conditions

**Discussion:**

The services listed above are all contained within the respective buildings they will serve except for some ground mounted utility boxes. Rocky Mountain Power requires the necessary power transformers to be outside of the buildings. The transformer servicing Building 1 will be toward the back corner of the building away from the midblock walkways. Building 2 is a large structure and requires multiple transformers which are in two places along 400 West: two are placed in an area recessed back from the front façade and one is placed at the northeast corner where the building angles in toward the lot. All these ground mounted utility boxes will be screened from public view in accordance with this standard. Review of the final details of mechanical equipment is to be delegated to planning staff as a condition of approval.
**Condition(s):** Final approval of the details for screening of ground mounted utility boxes to be delegated to Planning Staff to ensure compliance with the standards for Design Review.

<table>
<thead>
<tr>
<th>J. Signage shall emphasize the pedestrian/mass transit orientation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Define specific spaces for signage that are integral to building design, such as commercial sign bands framed by a material change, columns for blade signs, or other clearly articulated band on the face of the building.</td>
</tr>
<tr>
<td>2. Coordinate signage locations with appropriate lighting, awnings, and other projections.</td>
</tr>
<tr>
<td>3. Coordinate sign location with landscaping to avoid conflicts.</td>
</tr>
</tbody>
</table>

**Finding:** Complies

**Discussion:**
Signage for the project is primarily proposed for the commercial spaces in Building 1 and plans indicate areas on the columns for individual business blade signs. The plans also identify bands/areas for potential building signage on Building 1. Both sign areas have been coordinated with other features to prevent conflicts with lighting, landscaping, awnings, and other projections. No commercial freestanding signage has been proposed on the site, however directional, wayfinding, and security signs are likely and will be coordinated with landscaping. The existing billboard will be removed from the site as part of this project.

**Condition(s):** none

<table>
<thead>
<tr>
<th>K. Lighting shall support pedestrian comfort and safety, neighborhood image, and dark sky goals.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Provide street lights as indicated in the Salt Lake City Lighting Master Plan.</td>
</tr>
<tr>
<td>2. Outdoor lighting should be designed for low-level illumination and to minimize glare and light trespass onto adjacent properties and uplighting directly to the sky.</td>
</tr>
<tr>
<td>3. Coordinate lighting with architecture, signage, and pedestrian circulation to accentuate significant building features, improve sign legibility, and support pedestrian comfort and safety.</td>
</tr>
</tbody>
</table>

**Finding:** Complies With Conditions

**Discussion:**
A conceptual lighting plan was provided for each of the two buildings. The exact type of lighting is yet to be determined and will be required to comply with Design Review Standards and the general standards for lighting. The existing street lighting fixtures on 400 W and 600 S will be preserved and replaced during the construction of the project.

**Condition(s):** Final approval of the details for lighting to be delegated to Planning Staff to ensure compliance with the standards for Design Review.

<table>
<thead>
<tr>
<th>L. Streetscape improvements shall be provided as follows:</th>
</tr>
</thead>
</table>
1. One street tree chosen from the street tree list consistent with the City's urban forestry guidelines and with the approval of the City's Urban Forester shall be placed for each thirty feet (30’) of property frontage on a street. Existing street trees removed as the result of a development project shall be replaced by the developer with trees approved by the City's Urban Forester.

2. Hardscape (paving material) shall be utilized to differentiate privately-owned public spaces from public spaces. Hardscape for public sidewalks shall follow applicable design standards. Permitted materials for privately-owned public spaces shall meet the following standards:

   a. Use materials that are durable (withstand wear, pressure, damage), require a minimum of maintenance, and are easily repairable or replaceable should damage or defacement occur.

   b. Where practical, as in lower-traffic areas, use materials that allow rainwater to infiltrate into the ground and recharge the water table.

   c. Limit contribution to urban heat island effect by limiting use of dark materials and incorporating materials with a high Solar-Reflective Index (SRI).

   d. Utilize materials and designs that have an identifiable relationship to the character of the site, the neighborhood, or Salt Lake City.

   e. Use materials (like textured ground surfaces) and features (like ramps and seating at key resting points) to support access and comfort for people of all abilities.

   f. Asphalt shall be limited to vehicle drive aisles.

**Finding:** Complies With Conditions

**Discussion:**
Street trees for the development have been provided on the site plan and are spaced no more than 30’ apart. A list of trees to be used on the site has been provided and is consistent with Urban Forestry standards, but the species for each location on the plan has not been indicated on landscape plans. This will be done as part of the final site approval.

The applicant indicates the intention to comply with the hardscaping standards within the midblock walkways, but specific material details have yet to be finalized. Review of the final details will be delegated to planning staff as a condition of approval.

**Condition(s):** Final approval of the details for the midblock walkway hardscape to be delegated to Planning Staff to ensure compliance with the standards for Design Review.
21A.55.050: Standards for Planned Developments: The Planning Commission may approve, approve with conditions, or deny a planned development based upon written findings of fact according to each of the following standards. It is the responsibility of the applicant to provide written and graphic evidence demonstrating compliance with the following standards:

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

A. Planned Development Objectives: The planned development shall meet the purpose statement for a planned development (section 21A.55.010 of this chapter) and will achieve at least one of the objectives stated in said section. To determine if a planned development objective has been achieved, the applicant shall demonstrate that at least one of the strategies associated with the objective are included in the proposed planned development. The applicant shall also demonstrate why modifications to the zoning regulations are necessary to meet the purpose statement for a planned development. The Planning Commission should consider the relationship between the proposed modifications to the zoning regulations and the purpose of a planned development, and determine if the project will result in a more enhanced product than would be achievable through strict application of the land use regulations.

Planned Development Purpose Statement: A planned development is intended to encourage the efficient use of land and resources, promoting greater efficiency in public and utility services and encouraging innovation in the planning and building of all types of development. Further, a planned development implements the purpose statement of the zoning district in which the project is located, utilizing an alternative approach to the design of the property and related physical facilities. A planned development incorporates special development characteristics that help to achieve City goals identified in adopted Master Plans and that provide an overall benefit to the community as determined by the planned development objectives. A planned development will result in a more enhanced product than would be achievable through strict application of land use regulations, while enabling the development to be compatible with adjacent and nearby land developments.

Discussion:
This project implements the purpose statement of the General Commercial zoning district by providing a mix of commercial and residential uses not commonly found in the area with a focus on pedestrian access. It also results in a more enhanced product than could be built by right because it implements a higher degree of design, materials, and better amenities in the midblock walkways. It meets several Planned Development objectives, namely historic preservation, housing, mobility, sustainability, and master plan implementation. These objectives will be discussed below.

Finding: ☒ Meets Purpose Statement ☐ Does Not Meet Purpose Statement

A. Open Space And Natural Lands: Preserving, protecting or creating open space and natural lands:
1. Inclusion of community gathering places or public recreational opportunities, such as new trails or trails that connect to existing or planned trail systems, playgrounds or other similar types of facilities.
2. Preservation of critical lands, watershed areas, riparian corridors and/or the urban forest.
3. Development of connected greenways and/or wildlife corridors.
4. Daylighting of creeks/water bodies.
5. Inclusion of local food production areas, such as community gardens.
6. Clustering of development to preserve open spaces.

**Discussion:**
While the proposed silos park will create new community gathering places, the park is part of a future phase of the overall block development and therefore was not considered during the planned development analysis for phase 1.

**Finding:** ☒ Objective Satisfied ☐ Objective Not Satisfied

**B. Historic Preservation:**
1. Preservation, restoration, or adaptive reuse of buildings or structures that contribute to the character of the City either architecturally and/or historically, and that contribute to the general welfare of the residents of the City.
2. Preservation of, or enhancement to, historically significant landscapes that contribute to the character of the City and contribute to the general welfare of the City's residents.

**Discussion:**
The overall project will preserve 6 of the existing silos as a central feature of the development. Additionally, as part of phase 1, the applicants intend on preserving both the Miller and Casket Buildings. The silos as well as these two buildings are contributing structures to the Warehouse National Historic District and are part of the historic character of this block. It’s important to note that plans for these buildings could change and this objective would no longer be met, however the project would still meet several other objectives.

**Finding:** ☒ Objective Satisfied ☐ Objective Not Satisfied

**C. Housing:** Providing affordable housing or types of housing that helps achieve the City's housing goals and policies:
1. At least twenty percent (20%) of the housing must be for those with incomes that are at or below eighty percent (80%) of the area median income.
2. The proposal includes housing types that are not commonly found in the existing neighborhood but are of a scale that is typical to the neighborhood.

**Discussion:**
Residential development is called for in the master plan, is supported by the base zoning standards, and is not regularly found in this area of the city. This block is within the Grand Boulevards neighborhood identified in the Master Plan which calls for mid-rise buildings. The scale of the proposed residential buildings is compliant with that vision.

<table>
<thead>
<tr>
<th>Finding: ☒ Objective Satisfied</th>
<th>☐ Objective Not Satisfied</th>
</tr>
</thead>
</table>

**D. Mobility:** Enhances accessibility and mobility:

1. Creating new interior block walkway connections that connect through a block or improve connectivity to transit or the bicycle network.
2. Improvements that encourage transportation options other than just the automobile.

**Discussion:**
The Downtown Master Plan identifies two midblock walkways within the subject block. As part of the design review, the applicant is proposing a development agreement to create access easements to ensure the midblock walkways will be provided throughout the entire block, north to south and east to west during other phases of the overall development.

<table>
<thead>
<tr>
<th>Finding: ☒ Objective Satisfied</th>
<th>☐ Objective Not Satisfied</th>
</tr>
</thead>
</table>

**E. Sustainability:** Creation of a project that achieves exceptional performance with regards to resource consumption and impact on natural systems:

1. Energy Use And Generation: Design of the building, its systems, and/or site that allow for a significant reduction in energy usage as compared with other buildings of similar type and/or the generation of energy from an on-site renewable resource.
2. Reuse Of Priority Site: Locate on a brownfield where soil or groundwater contamination has been identified, and where the local, State, or national authority (whichever has jurisdiction) requires its remediation. Perform remediation to the satisfaction of that authority.

**Discussion:**
The property where Building 2 is proposed is the location of a former coal yard that has a large amount of abandoned coal remaining on site. Contaminants have leached into the soil which has caused contamination above acceptable levels. As such, the applicant will complete an environmental remediation of the site with the State’s Department of Environmental Quality, Division of Waste Management and Radiation Control. The site can be considered a priority site since it is located at an entrance landmark from I-15 along 600 S as identified on the Downtown Master Plan.

<table>
<thead>
<tr>
<th>Finding: ☒ Objective Satisfied</th>
<th>☐ Objective Not Satisfied</th>
</tr>
</thead>
</table>

**F. Master Plan Implementation:** A project that helps implement portions of an adopted Master Plan in instances where the Master Plan provides specific guidance on the character of the immediate vicinity of the proposal:
1. A project that is consistent with the guidance of the Master Plan related to building scale, building orientation, site layout, or other similar character-defining features. (Ord. 8-18, 2018)

**Discussion:**
As discussed in Consideration 1, the proposal is consistent with the Downtown Plan in terms of urban form, housing choice, and pedestrian-oriented development to further develop the entrance to downtown from I-15.

**Finding:** ☒ Objective Satisfied ☐ Objective Not Satisfied

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**B. Master Plan Compatibility:** The proposed planned development is generally consistent with adopted policies set forth in the Citywide, community, and/or small area Master Plan that is applicable to the site where the planned development will be located.

**Finding:** Complies

**Discussion:**
As discussed in Consideration 1, staff finds that the proposal is consistent with adopted policies in the Downtown Plan.

**Condition(s):** none

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**C. Design And Compatibility:** The proposed planned development is compatible with the area the planned development will be located and is designed to achieve a more enhanced product than would be achievable through strict application of land use regulations. In determining design and compatibility, the Planning Commission should consider:

1. Whether the scale, mass, and intensity of the proposed planned development is compatible with the neighborhood where the planned development will be located and/or the policies stated in an applicable Master Plan related to building and site design;

**Finding:** Complies

**Discussion:**
The scale, mass and intensity of the project is compatible with the area and its increasingly intense, mid-rise development pattern and, as detailed in Consideration 1, compatible with Master Plan policies.

**Condition(s):** none

2. Whether the building orientation and building materials in the proposed planned development are compatible with the neighborhood where the planned development will be located and/or the policies stated in an applicable Master Plan related to building and site design;
Finding: Complies

Discussion:
The orientation of the development is compatible with the neighborhood. Building 2 is located on a corner and the 600 S façade contributes to the shape of the street edge while the main façade facing 400 W includes ground level residential entrances and features that break up the façade and contribute to the pedestrian scale along that street. The building materials proposed exceed the minimum requirements of the underlying zone.

Condition(s): none

3. Whether building setbacks along the perimeter of the development:
   a. Maintain the visual character of the neighborhood or the character described in the applicable Master Plan.
   b. Provide sufficient space for private amenities.
   c. Provide sufficient open space buffering between the proposed development and neighboring properties to minimize impacts related to privacy and noise.
   d. Provide adequate sight lines to streets, driveways and sidewalks.
   e. Provide sufficient space for maintenance.

Finding: Complies

Discussion:
d. The proposed development contributes to the changing character of the neighborhood by providing residential uses, mid-rise buildings, mid-block walkways, and improving the streetscape for the entrance to downtown.

e. The development provides amenity space for residents including a courtyard area, wellness/fitness area, bike storage, pool deck, and top floor amenity space.

f. The adjacent properties are also part of the overall development plan for this block. Open space has been provided along the interior block streets and as part of the park.

g. The proposal provides adequate sight lines from the interior streets to the public streets. All vehicular facilities will be required to meet transportation standards for pedestrian visibility.

h. The site plan provides adequate space for maintenance requirements.

Condition(s): none

4. Whether building facades offer ground floor transparency, access, and architectural detailing to facilitate pedestrian interest and interaction;

Finding: Complies

Discussion:
The development places a large emphasis on pedestrian interaction through the use of ground floor residential unit entrances, wide sidewalks, patio spaces, street trees, and gathering places. The design includes changes in materials, balconies, windows, covered patios, and changes in depth to facilitate pedestrian interest. The ground floor uses provide as much glass as feasible for the uses; the residential units have multiple street windows per unit, the amenity spaces feature glass as the
primary façade material, and the commercial spaces in Building 1 utilize storefront glazing to increase visibility into the spaces from the patios and park.

**Condition(s):** none

5. Whether lighting is designed for safety and visual interest while minimizing impacts on surrounding property;

**Finding:** Complies With Conditions

**Discussion:**
A conceptual lighting plan was submitted and is designed for safety and visual interest. Review of final details of the lighting plan is a condition of approval that is recommended to be delegated to planning staff.

**Condition(s):** Final approval of the details for project lighting to be delegated to Planning Staff to ensure compliance with the standards for Planned Developments.

6. Whether dumpsters, loading docks and/or service areas are appropriately screened;

**Finding:** Complies

**Discussion:**
Internal trash rooms are proposed for both residential and commercial uses. All required loading docks will be within the interior parking structure of Building 2. Building 1 is not required to provide a loading dock. It will have a rear alley to accommodate deliveries to the ground floor commercial spaces.

**Condition(s):** none

7. Whether parking areas are appropriately buffered from adjacent uses.

**Finding:** Complies

**Discussion:**
The proposal includes 117 parking spaces on the ground floor of Building 2. The parking areas are adequately screened with a combination of obscured glass, pedestrian ground floor uses, residential units, and durable building materials. The remaining parking for the project will be accommodated through an off-site parking lot that includes an existing warehouse retrofitted into a parking garage (68 stalls) and a surface parking lot (147 stalls). The surface parking will be required to comply with all landscaping and buffering standards in the zoning code.

**Condition(s):** none
D. Landscaping: The proposed planned development preserves, maintains or provides native landscaping where appropriate. In determining the landscaping for the proposed planned development, the Planning Commission should consider:

1. Whether mature native trees located along the periphery of the property and along the street are preserved and maintained;

**Finding: Complies**

**Discussion:**
The landscape plan identifies several existing mature trees that will be preserved and protected during construction.

**Condition(s):** none

1. Whether existing landscaping that provides additional buffering to the abutting properties is maintained and preserved;

**Finding: Complies**

**Discussion:**
The site is a former industrial area and therefore has minimal landscaping and none of it provides buffering benefits.

**Condition(s):** none

2. Whether proposed landscaping is designed to lessen potential impacts created by the proposed planned development;

**Finding: Complies**

**Discussion:**
The proposed landscaping will comply with landscaping requirements and will include trees, planter beds, grasses, and shrubs along both the public and private rights-of-way.

**Condition(s):** none

3. Whether proposed landscaping is appropriate for the scale of the development.

**Finding: Complies**

**Discussion:**
The proposed landscaping exceeds the minimum amount of landscaping required by the zoning ordinance and design review, will enhance the site for the neighborhood, improves storm water flow and ground water infiltration, and will provide a positive pedestrian experience around and throughout the site.
### E. Mobility

The proposed planned development supports Citywide transportation goals and promotes safe and efficient circulation within the site and surrounding neighborhood. In determining mobility, the Planning Commission should consider:

1. Whether drive access to local streets will negatively impact the safety, purpose and character of the street;

**Finding:** Complies

**Discussion:**
The proposed site circulation consolidates the existing curb cuts into 1 drive access per street frontage thus reducing the conflict points with pedestrians and contributing to the pedestrian character of the streets.

**Condition(s):** none

2. Whether the site design considers safe circulation for a range of transportation options including:
   a. Safe and accommodating pedestrian environment and pedestrian oriented design;
   b. Bicycle facilities and connections where appropriate, and orientation to transit where available; and
   c. Minimizing conflicts between different transportation modes;

**Finding:** Complies

**Discussion:**
As discussed above, the site design reduces potential conflict points between pedestrians and drivers by limiting the number of vehicle entrances. Sidewalks and crosswalks that feature grade and surface changes are provided to create a pedestrian oriented flow throughout the site. Bicycle facilities will be provided as required by the zoning ordinance.

**Condition(s):** none

3. Whether the site design of the proposed development promotes or enables access to adjacent uses and amenities;

**Finding:** Complies

**Discussion:**
The site will include multiple mid-block connections, both pedestrian and vehicular, to promote connectivity through the site and to adjacent uses.

**Condition(s):** none
4. Whether the proposed design provides adequate emergency vehicle access;

**Finding: Complies**

**Discussion:**
The proposal is required to provide fire suppression to meet all fire code requirements. EMS and police will have access to the interior of the lot through the midblock streets.

**Condition(s):** none

5. Whether loading access and service areas are adequate for the site and minimize impacts to the surrounding area and public rights-of-way.

**Finding: Complies**

**Discussion:**
The waste, mechanical equipment, and storage areas for the development will be interior to the buildings at ground level out of public view. Building 1 is not required to have a loading dock but does provide a private alley at the back of the building for commercial deliveries. Building 2 will have two loading docks within the parking garage. These will be required to meet the standards found in 21A.44.

**Condition(s):** none

F. Existing Site Features: The proposed planned development preserves natural and built features that significantly contribute to the character of the neighborhood and/or environment.

**Finding: Complies**

**Discussion:**
This block is part of the Warehouse National Historic District and the applicants intend on preserving the Miller and Casket Buildings, which are located on the phase 1 project site. These two buildings are contributing structures to the district and are part of the historic character of this block. It’s important to note that buildings within a National Historic District are not regulated by Salt Lake City so there is no protection from demolition.

**Condition(s):** none

G. Utilities: Existing and/or planned utilities will adequately serve the development and not have a detrimental effect on the surrounding area.

**Finding: Complies**

**Discussion:**
Public facilities may be required to be upgraded for any new development and the applicant would be responsible for those upgrades. The sheer size of the project creates a longer timeline for coordinating the public utilities to and through the site and the applicant is working closely with the Public Utilities Department to ensure adequate facilities. Compliance will be verified during the permit review process.

**Condition(s):** none
Public Notice, Meetings, Comments

At the time of the application, no recognized community organizations (RCO) were registered for this area. Therefore, the 45-day notice to RCOs was not required.

An early notification was sent out to all property owners and residents within 300’ of the project on May 3, 2023.

Notice of the public hearing for the proposal included:

- **June 16, 2023**
  - Public hearing notice sign posted on the property
- **June 16, 2023**
  - Public hearing notice mailed
  - Public notice posted on City and State websites and Planning Division list serve

Public Input:

No comments from the public were received at the time of publishing. Any comments submitted after publishing will be submitted to the Planning Commission for consideration.
ATTACHMENT I: Department Review Comments

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

**Engineering:** Scott Weiler ([scott.weiler@slegov.com](mailto:scott.weiler@slegov.com))

No comments.

**Zoning:** Katilynn Harris ([katilynn.harris@slegov.com](mailto:katilynn.harris@slegov.com))

**Planning Staff Note:** These comments were addressed during the review process for the applications. Final approval from Zoning will be required at the building permit stage.

**Subdivision**

Flag lots will need to comply with the standards found in 21A.36.010.E. Lot 4 does not meet the minimum 24’ of street frontage and therefore it will need to be included in the Planned Development request for a lot without frontage.

Lot 6 appears to have the 24’ of street frontage however, it doesn’t not comply with standard 21A.36.010.E3b which permits flag lots if the site development is not conducive to private streets. Therefore, under the current proposal, lot 6 and its associated building will need to be included in the Planned Development request for a building/lot without street frontage.

The park parcel will also need Planned Development approval as it too does not have street frontage.

**Site Plan**

Update the various site plans (CSP-1, CUP-1, and L101) to show the most recent development plans. Specifically, ensure the building entrances and transformers are shown in the correct locations.

Identify the location of dumpsters, loading docks, and service areas.

The surface parking lot must comply with the parking lot landscaping requirements in 21A.48.070. Show compliance to those standards on the site plan; specifically the interior lot landscaping.

Show the width of the proposed sidewalks throughout the development site and width of any park strip areas where trees are proposed.

Clarify if the power lines along 400 W will be buried or not.

**Landscape Plan**

The additional landscaping standard for additional height in the CG zone reads: “If additional floors are approved, increased landscaping shall be provided over and above that which is normally required for landscape yards, landscape buffer yards, and parking lot perimeter and interior landscaping. The amount of increased landscaping shall be equal to ten percent (10%) of the area of the additional floors.” Calculate the additional landscaping required for buildings 1 and 3. Calculations should clearly show the following:

1. **Amount of additional landscaping required for each building requesting additional height.**

2. **total amount of landscaping provided on the site or off site to satisfy this requirement (park areas, etc.).** Please note that the required landscaped yard along 400 W and parking lot
perimeter/interior parking lot landscaping does not count toward the additional landscaping for the building height.

Calculate the number of street trees that are required and show the required 30’ spacing.

**LIGHTING PLAN**

Provide a lighting plan that shows compliance with Design Review Standard K. Additionally, show the lighting for the midblock walkways to ensure they are adequately lit to ensure pedestrian safety.

**PLANNED DEVELOPMENT**

A few things needed to be added to the PD request; the required landscaping for the additional building height being met off site and lots without public street frontage. You will need to update the project narrative to include the additional modifications and justification for the requested modifications.

**DESIGN REVIEW**

*600 S Façade*

Standard C calls for details that facilitate pedestrian interest. The blank wall in the center of the façade needs to better comply with this standard.

Standard G calls for a distinct base, middle, and top. The sawtooth roofline establishes the top but the base and middle need to be more clearly differentiated.

*400 W Façade*

Standard C requires details to facilitate pedestrian interaction and interest. Recognizing that the ground floor uses are residential units, additional glazing isn’t feasible. However, a material change (e.g. different material/brick pattern) can interrupt the blank walls between the units and particularly surrounding the building entrances. Also differentiate between the building entrances and the private residential entrances through signage, different door type, or other such methods.

Standard G calls for a distinct base, middle, and top. The fenestration and materials change establish the base but the middle and top need to be more clearly differentiated.

Clarify what the open space is between the two building masses. In one drawing it is the location of several transformers, in another it is an entrance to the parking garage, in another it appears to be a dog park.

*Privately-Owned Public Spaces*

The park and midblock walkways are considered privately-owned public spaces and therefore must each include 3 of the 6 elements listed in Standard F. The project narrative claims the elements for the park will be siting spaces, seasonal shade, public art, and outdoor dining areas. These elements will need to be shown on the plans. Additionally, 3 of the 6 elements for the midblock walkways will need to be identified and shown on the plans.

As briefly discussed in our first meeting, there are two midblock walkways on this block; one running north/south while the other runs east west. Identify on the plans the path of the two midblock walkways.

and how they will provide a safe, comfortable experience for pedestrians. This includes things like adequate lighting, visibility, wayfinding, and avoiding conflicts between pedestrians an automobile traffic through the site.

Additionally, in Standard L there are standards for hardscape materials in privately-owned public spaces that will need to be met. Show that the proposal meets these standards on the drawings.
Standard I

Identify the locations of the waste/recycling containers, storage areas, loading docks and mechanical equipment. If they are not located within the building, each element needs to be screened from the public street incorporating materials and details compatible with the building being service. Specifically of note are the transformers for building 3. Those will need to be screen with a wall or other structure; landscaping will not satisfy this standard.

ASSORTED COMMENTS

Please contact Scot Weiler at scot.weiler@slcgov.com or 801-535-6159 in Engineering to discuss the proposed private streets.

There appears to be a private alley to the north of building 3 which is being redeveloped into a private street. Please clarify what you are proposing for this alley; incorporating it into your lot area, preserving the alley, etc. Any action with the alley will require the approval of all parties with legal use of the alley.

In addition to the renderings that show landscaping, please provide renderings and elevations without the landscaping. It clouds the ground floor making the review of the building difficult.

Detail how the billboard at 568 S 400 W will be addressed. If the billboard is remaining on the site, please show it on the site plan.

Fire: Doug Bateman (douglas.bateman@slcgov.com)

*Approved fire apparatus access roads shall be provided for every facility, building or portion of a building hereafter constructed or moved into; and shall extend to within 150 feet of all portions of the facility and all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility. Verify compliance with measurements in straight lines and right angles. AMM may be necessary.

*Fire apparatus access roads shall have an unobstructed width of not less than 20 feet for buildings 30-feet and less, exclusive of shoulders, except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance of not less than 13 feet 6 inches. Buildings greater than 30 feet shall have a road width of not less than 26 feet. Fire apparatus access roads with fire hydrants on them shall be 26-feet in width; at a minimum of 20-feet to each side of the hydrant in the direction or road travel. I believe previous conversations were to have all interior private roads at 26-feet due to aerial access on short side of building 1

*Approved fire apparatus access roads shall be designed and maintained to support the imposed loads of fire apparatus (80,000 pounds) and shall be surfaced to provide all-weather driving capabilities.

*The required turning radius of a fire apparatus access road shall be the following: Inside radius is 20 feet, outside is 45-feet

*Dead-end fire apparatus access roads in excess of 150 feet in length shall be provided with an approved area for turning around fire apparatus. Turn areas for hammerhead are increased to 80-feet (160-feet total) to accommodate SLC Fire Department apparatus. See appendix D for approved turnarounds

*Buildings or portions of buildings constructed or moved into within the jurisdiction is more than 400 feet from a hydrant on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains shall be provided where required by the fire code official. Additional fire hydrants may be necessary dependent on total square footage and required fire flows in accordance with IFC appendix B and C
*Fire department connections shall be located on the street address side of buildings, fully visible and recognizable from the street, and have a fire hydrant within 100-feet on the same side of the street.

*Where a fire hydrant is located on a fire apparatus access road, the minimum road width shall be 26 feet, exclusive of shoulders.

*Aerial fire apparatus access roads shall be provided where the highest roof surface exceeds 30 feet measured from grade plane. For purposes of this section, the highest roof surface shall be determined by measurement to the eave of a pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, whichever is greater. Some exceptions have been added by SLC; those can be obtained from this office.

*Aerial fire apparatus access roads shall have a minimum unobstructed width of 26 feet, exclusive of shoulders. Aerial access routes shall be located not less than 15 feet and not greater than 30 feet from the building and shall be positioned parallel to one entire side of the building.

*Overhead utility and power lines shall not be located over the aerial fire apparatus access road or between the aerial fire apparatus road and the building.

*Any occupied roof or floor above 75-feet as measured from the lowest level of fire department access is dedicated as high rise

*No parking signs shall be posted on all interior roads that don't meet requirements of IFC D 103.6

*Verify standpipe connections are located within 200-feet of all interior spaces of the buildings as measured from the intermediate landing of each stairway.

**Planning Staff Note:** Final approval from Fire will be required at the building permit stage.

**Urban Forestry:** Rick Nelson (rick.nelson@slcgov.com)

Urban Forestry has no direct concerns with these plans. We do require the preservation and protection of existing trees in the public ROW parkstrips surrounding the project. We also expect plans to include proposed street tree plantings at the rate of one tree proposed for every 30’ of adjacent city street frontage. It appears from the preliminary plans that this is their intent. Specific species of trees will be required during the plans review process.

**Sustainability:** Debbie Lyons (debbie.lyons@slcgov.com)

No comments submitted at this time.

**Building Code:** Bryan Romney (bryan.romney@slcgov.com)

It appears that both buildings 1 & 3 are "podium" buildings as prescribed by the IBC Section 510.2. As such, the combined building is limited by the building height and not number of stories for the portion of the building above the Horizontal Assembly based on its Construction Type. The above podium building in both buildings is Construction Type IIIA which has a building height limitation of 85’ above Grade Plane (IBC Table 504.3). Please provide the building height calculations as defined in the IBC definition of Building Height.

Utility extensions, including the hose pull across adjoining properties shall be provided with a recorded joint-use Agreement or Easement for each adjoining property. Please confirm.

Clarify that all the Private Drives will be dedicated and recorded as permanent Public Ways.

Identify the Fire Separation Distance on the North lot line of Building 1. Depending on that distance,
IBC Table 705.8 will have limitations on the opening along that wall. Also, IBC Section 1028.4 will have requirements for an Egress Court.

Provide a Code Analysis for the existing buildings. The governing code will be the IEBC

**Police:** Andrew Cluff ([andrew.cluff@slcgov.com](mailto:andrew.cluff@slcgov.com))

Public areas present a difficult crime issue to deal with. The best thing that can be done for those areas are having clearly posted signage for what the intended use of the public area is and the rules for the park. I would include an open and closure time as well and a notice to call police if you see anything suspicious or criminal. I would also recommend that the business owners and property managers contact the police department regarding how to address crime in their area and develop a plan for police response to the private residences in the area. I would also recommend City No Trespassing signs for the businesses to be placed in visible areas. They give officers the ability to enforce the ordinance without always having to be called all the time. It also helps with prosecution if we are able to document that there is a sign in place and a signed affidavit on file with the reporting entity. Same recommendations for the in block streets. Good signage will go a long way in helping us to enforce the area as well as directing pedestrian and vehicular traffic.

The lighting plan looks really good. I would also recommend a good maintenance plan so trees and shrubs don’t become overgrown creating areas for people to hide or conceal nefarious activity.

**Public Utilities:** Ali Farshid ([ali.harshid@slcgov.com](mailto:ali.harshid@slcgov.com))

*PU has no issues for the proposed height change. Additional comments have been provided to assist in the future development of the property. The following comments 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.
- Utilities cannot cross property lines without appropriate easements and agreements between property owners.
- Parcels must be consolidated prior to permitting, if applicable.
- 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 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 demand is not adequately delivered or if one or more reaches of the sewer system reach capacity as a result of the development, a water/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 project and extended beyond the property lines.

- One culinary water meter is permitted per parcel and fire services, as required, will be permitted for this 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.
- Private fire hydrants will require detector checks.
- 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 (BMPs) 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).
- A Storm Water Pollution Prevention Plan (SWPPP) is required for this project. Submit the SWPPP to be reviewed along with the plans in the "Soils, SWPPP, & Drainage Reports" folder. It is recommended to use the State of Utah SWPPP template. Ensure that it includes all relevant contacts, the Utah State Construction General Permit, State and City Notice of Intent (NOI), any relevant figures, and is signed by the Author, Owner, and Operator. Plans will not be approved until the SWPPP is approved.
- Public streetlights will be required as part of this project. Please contact David Pearson (the SLCDPU Streetlight Program Manager) at david.pearson@slcgov.com or 801-483-6738 to discuss the requirement and details.
- Commercial kitchens and restaurants will require an underground, exterior grease interceptors and sampling manhole.
- Additional SLCDPU comments may apply and will be provided during the review process once the project is submitted for a building permit.

**Planning Staff Note:** Final approval from Public Utilities will be required at the building permit stage.

**Transportation:** Jena Carver ([jena.carver@slcgov.com](mailto:jena.carver@slcgov.com))

All loading berths must be located on site and comply with the following requirements per 21A.44.070 Off Street Loading Areas:

B. Location and Design of Loading Areas:

1. All required loading berths shall be located on the same development site as the use(s) served.

2. No loading berth shall be located within thirty feet (30’) of the nearest point of intersection of any two (2) streets.

3. No loading berth shall be located in a required front yard.

4. Each required loading berth shall be located and designed to:

   a. Allow all required vehicle maneuvering and backing movements on-site;
   
   b. Minimize conflicts with pedestrian, bicycle, and traffic movement or encroachments into any pedestrian walkway, bicycle lane, public right-of-way, and fire lane; and
   
   c. Avoid the need to back into a public street while leaving the site to the maximum extent practicable, as determined by the planning director and the transportation director.
5. Landscaping and screening of all loading berths shall be provided to comply with the requirements of Chapter 21A.48, "Landscaping and Buffers".

6. Where a loading berth is illuminated, the light source shall be shielded so that the light source is not directly visible from any abutting property or abutting private or public street.

7. All signs in loading areas shall comply with Chapter 21A.46, "Signs", and applicable provisions of the Manual on Uniform Traffic Control Devices.

8. All required loading berths shall comply with the surfacing standards of the Off Street Parking Standards Manual. (Ord. 67-22, 2022)

The submitted plan shows a loading berth on the public street, which is not allowed. Modifications to the plan must be made prior to building permit.