



MEMORANDUM

PLANNING DIVISION
DEPARTMENT of COMMUNITY and NEIGHBORHOODS

To: Salt Lake City Planning Commission
From: Madison Blodgett, Principal Planner
Date: May 8, 2024
Re: PLNPCM2023-00937

Text Amendment (Continued Item)

ACTION REQUIRED: Consider modifications made to the proposal in response to discussion and comments made at the March 27th, Planning Commission meeting, and make a recommendation on the proposal.

REQUEST: Mayor Erin Mendenhall has initiated a zoning text amendment to correct driveway and loading area standards found in the zoning code that are creating unintended consequences. The proposed changes fix issues with the current standards to adequately address vehicular access needs and support good urban design.

RECOMMENDATION:

Staff is recommending that the Commission forward a favorable recommendation on this request to the City Council.

ATTACHMENTS:

- A. [Attachment A: Revised Proposed Ordinance](#)
- B. [Attachment B: March 27, 2024, Staff Report](#)
- C. [Attachment C March 27, 2024, PC Meeting Minutes](#)

BACKGROUND:

The proposal was presented at a public hearing with the Planning Commission on March 27, 2024. The commission raised concerns regarding the proposal to remove off street loading requirements and voted to table the item to allow for revisions to the proposal to address the concerns. The two main concerns discussed by the Commission were multifamily uses will not provide a loading area if there is no requirement and the public right-of-way being used for loading.

A video recording of the Planning Commission meeting can be viewed here – <https://www.youtube.com/live/cDBnGNY3TaI?si=fgD7VSXzVt7UmuIM>

The minutes from the March 27, 2024 meeting can be found in [Attachment C](#).

SUMMARY OF REVISIONS:

In response to the Planning Commission discussion, staff revised the proposed amendment to continue to require loading areas. Additionally, vertical clearance requirement for multi-family uses with 80 units or more has been reduced from 14’ to 9’. The revisions made to the ordinance have been highlighted in [Attachment A](#).

DISCUSSION:

The revised proposal addresses the Planning Commission’s concerns to ensure loading needs are met with a more tailored approach to loading area regulations based on use of the property. One of the main issues staff identified with the loading area requirements is the 14’ vertical clearance requirement—specifically how that impacts building design for multi-family uses. Because the 14’ clearance requirement is higher than the typical ground floor of a residential or mixed-use building, it leads to a taller than average parking garage ceiling, consuming valuable space that could otherwise be utilized by the principal use the loading area is serving. If the loading is not designed to be in the parking garage, one must be included somewhere else in the design, which is often difficult as these buildings take up most of the lot. This often requires an additional driveway for access which creates issues on lots less than 350’ where only one curb cut is allowed.

To address this issue, the proposal has been revised to reduce the 14’ vertical clearance requirements to 9’ for multi-family uses. The vertical clearance for all other uses will remain 14’. This recommended revision reflects what staff learned from researching loading area standards in other cities. Staff found that vertical clearance requirements for multi-family uses are different from other uses. For example, in Portland the loading area vertical clearance for residential uses is 10’ and 13’ for commercial and industrial uses. In Denver, commercial and industrial uses require 14’ vertical clearance and for multi-family the loading area dimensions are determined at site development plan. These examples support that multi-family loading needs are different than other uses and should be regulated with that consideration. Unlike loading areas for nonresidential uses which are generally to support large pickups or deliveries, loading areas for multi-family uses are for residents moving in and out of the building. This type of activity does not require as much vertical clearance as other uses since the vehicles utilizing this loading area are moving box trucks not large semitrucks. The average box truck used for moving is less than 9’ in height. The 14’ clearance is unnecessary for residential uses.



What Fits into a Truck

Home Size	Small Loads / Studio Apt	Studio Apt / Deliveries	Studio / 1 Bedroom Apt	1 Bedroom Home / 2 Bedroom Apt	2 Bedroom Home / 3 Bedroom Apt	3-4 Bedroom Home
Equivalent Storage Size	5' x 10' x 8'	5' x 10' x 8'	5' x 10' x 8'	10' x 10' x 8'	10' x 15' x 8'	10' x 20' x 8'
U-Box Size Comparison	1	2	3	4	5	6

Figure 1 Dimensions of commonly used moving vehicles.

The proposal also addresses the impact the 14' vertical clearance requirement has on residential building design. As shown in Figure 2, typical ground floor height is less than 14' and the space taken up by the loading area to accommodate the 14' clearance is sufficient to add an additional dwelling unit. Reducing the vertical clearance height allows the loading area to be in line with the height of the rest of the ground floor and incorporated into the parking garage, eliminating the need for additional driveway width or curb cuts to accommodate a separate loading area outside the parking garage as demonstrated by Figure 3.



Figure 2 Example of a multi-family project at 45 N Chicago St where the 14' vertical clearance requirement for the loading area exceeds the height of the ground floor extending into the second story and requiring the loading area be located outside the parking garage.



Figure 3 Example of the impact to the building design reducing the vertical clearance requirement to 9' has on the same 45 N Chicago St project. The loading area can be located inside the parking garage reducing the driveway width and freeing up space for an additional dwelling unit where the loading area used to be.

STAFF RECOMMENDATION:

The proposal furthers the purpose of the city's policies and goals. The proposal is consistent with goals found in [Plan Salt Lake](#) and the standards for Zoning Amendments standards as found in the staff considerations and standards analysis of the March 27th staff report that can be accessed in [Attachment B](#). Due to these considerations, **staff is recommending that the Commission forward a favorable recommendation on this request to the City Council.**

NEXT STEPS:

The Planning Commission can provide a positive or negative recommendation for the proposal and can request that changes be made to the proposal. The recommendation and any requested changes will be sent to the City Council, who will hold a briefing and additional public hearing on the proposed changes. The City Council may make modifications to the proposal and approve or decline to approve the proposed changes. If ultimately approved by the City Council, the changes would be incorporated into the City Zoning code and development would be required to follow the new regulations.

Attachment A: Revised Proposed Ordinance

21A.40.050.A.

2. ~~Corner Lots Side Yards: No accessory building on a corner lot shall be closer to the street than the distance required for corner side yards. At no time, however, shall an accessory building be closer than twenty feet (20') to a public sidewalk or public pedestrian way and the accessory building shall be set back at least as far as the principal building. Accessory buildings are prohibited in a required corner side yard.~~ Notwithstanding the foregoing, hoop houses and cold frame structures up to twenty four inches (24") in height may be placed in a corner side yard.

21A.44.060: PARKING LOCATION AND DESIGN:

All required parking areas shall be located and designed in accordance with the standards in this [Chapter 21A.44: Off Street Parking, Mobility, and Loading](#) and the standards in the Off Street Parking Standards Manual. ~~Modifications to the standards of this Section 21A.44.060 may be granted through the design review process, subject to conformance with the standards and procedures of [Chapter 21A.59: Design Review](#).~~

A. Generally:
(...)

6. Driveways and Access Drive Approaches:

a. Compliance with Other Adopted Regulations:

(1) Parking lots shall be designed in compliance with applicable city codes, ordinances, and standards, including but not limited to Title 12 of this code: Vehicles and Traffic and the Off Street Parking Standards Manual to the maximum degree practicable, with respect to:

- (A) Minimum distances between curb cuts;
- (B) Proximity of curb cuts to intersections;
- (C) Provisions for shared driveways;
- (D) Location, quantity and design of landscaped islands; and
- (E) Design of parking lot interior circulation system.

(2) Notwithstanding the provisions of Subsection [21A.44.060.A.6.a\(1\)](#) above, relocation of a driveway for a single-family, two-family, or twin home residence in any zoning district shall only be required when the residence is replaced, and shall not be required when the residence is expanded or renovated in compliance with the city code.

b. ~~Access~~ General Standards: Access to all parking facilities shall comply with the following standards:

(1) To the maximum extent practicable, all off street parking facilities shall be designed with vehicular access to a street or alley that will least interfere with automobile, bicycle, and pedestrian traffic movement.

(2) Parking facilities in excess of five (5) spaces that access a public street shall be designed to allow vehicles to enter and exit the lot in a forward direction.

(3) ~~Number of curb cuts: Parking facilities on lots~~ Lots with less than one hundred feet (100') of street frontage shall have only one (1) curb cut, and lots ~~Lots with one hundred feet (100') of street frontage or more shall be limited to two (2) curb cuts, unless, are permitted one~~ (1) curb cut for the first one hundred feet (100') of street frontage and one (1) additional curb cut for every additional two hundred fifty (250') of street frontage. ~~The~~ The transportation director determines that may approve additional curb cuts are when necessary to ensure pedestrian, bicycle, and vehicle safety or to comply with the fire code. Public safety uses shall be exempt from limitations on curb cuts.

~~(4) All vehicular access roads/driveways shall be surfaced as required in accordance with Subsection 21A.44.060.A.8, "Surface Materials".~~

(4) Location: Driveways and drive approaches shall be at least 5 feet from any public utility infrastructure such as power poles, fire hydrants, and water meters.

(5) Distance from street corners: Driveways and drive approaches for Single and Two-Family Dwellings shall be located at least 20 feet from street corner property lines. Driveways and drive approaches for all other uses shall be at least 50 feet from street corner property lines. When the width of the lot is less than the required distance, the transportation director may approve modifications no greater than the minimum necessary to accommodate the driveway and drive approach.

(6) Lead to approved parking area: Except for entrance and exit driveways leading to approved parking areas, no curb cuts or driveways are permitted.

~~(1) Driveway Location: Driveways shall be at least 5 feet from any public utility infrastructure such as power poles, fire hydrants, and water meters. Except for entrance and exit driveways leading to approved parking areas, no curb cuts or driveways are permitted.~~

~~(2) Distance from street corners: Driveways for Single and Two Family Dwellings shall be located at least 20 feet from street corner property lines. Driveways for all other uses shall be at least 50 feet from street corner property lines. When the width of the lot is less than the required distance, the transportation director may approve modifications no greater than the minimum necessary to accommodate the driveway leading to approved parking areas, no curb cuts or driveways are permitted.~~

~~(3) (7) Driveway Drive Approach Widths: All driveways drive approaches serving residential uses shall be a minimum eight feet wide and shall comply with the standards for maximum driveway widths listed in Table 21A.44.060-C, "Minimum and Maximum Driveway Drive Approach Width".~~

TABLE 21A.44.060-C: MINIMUM AND MAXIMUM DRIVEWAY DRIVE APPROACH WIDTH:		
Zoning District	Minimum Driveway Drive Approach Width (in front and corner side yard)*	Maximum Driveway Drive Approach Width* (in front and corner side yard)

SR-1, SR-2 and SR-3	8 ft.	22 ft.
MH	8 ft.	16 ft.
Other Residential Zoning Districts	8 ft.	30 24 ft.
M-1 and M-2	12 ft. single lane and 24 ft. for two-way	50 30 ft.
Other Non-Residential Zoning Districts	12 ft. single lane and 24 ft. for two-way	30 ft.
* Maximum width is for all driveways combined when more than one driveway is provided All drive approaches serving residential uses shall be a minimum eight feet (8') wide.		

(8) The width of the driveway shall match the width of the drive approach that provides access to it.

(9) Garage Doors and Vehicle Staging: All driveways providing access to a garage shall have a minimum vehicle staging area. Garage doors for passenger vehicles shall be setback at least 17 feet 6 inches from the back edge of sidewalk, or property line when a sidewalk is not provided. Garage doors for large truck shall be setback at least 100 feet from back edge of sidewalk, or property line when a sidewalk is not provided. This requirement does not apply to garage doors abutting alleys.

~~(4)~~ (10) Shared Driveways: Shared driveways, where two or more properties share one ~~driveway access~~ drive approach, may be permitted if the transportation director determines that the design and location of the shared ~~driveway access~~ drive approach will not create adverse impacts on traffic congestion or public safety.

~~(5) Driveway Surface: All driveways providing access to parking facilities shall be improved and maintained pursuant to the standards in the Off Street Parking Standards Manual.~~

7. Minimum Dimensional Standards: All parking spaces shall comply with the dimensional standards in the Off Street Parking Standards Manual.

8. Surface Materials: All parking spaces, driveways and drive approaches shall comply with the standards for surfacing of access, driving, and parking surfacing in the Off Street Parking Standards Manual.

(...)

B. Zone Specific Location and Design Standards:

1. D-1, D-3, D-4, and G-MU Zoning Districts: The following regulations shall apply to surface or above-ground parking facilities. No special design and setback restrictions shall apply to below-ground parking facilities.

a. Above-ground parking facilities located within the block corner areas and on Main Street, shall be located behind principal buildings and:

(1) All above-ground parking facilities that front a street shall contain uses other than parking along the entire length of the building façade and along all stories or levels of the building.

(2) ~~Vehicle access~~ Drive approaches and driveways to parking shall be located to the side of the building or as far from the street corner as possible unless further restricted by this title.

(...)

2. TSA Transit Station Area District: New uses and development or redevelopment within the TSA Transit Station Area District shall comply with the following standards.

a. Surface Parking on Corner Properties: On corner properties, surface parking lots shall be located behind principal buildings or at least sixty feet (60') from the intersection of the front and corner side lot lines.

b. Surface Parking in the Core Area: Surface parking lots in the core area are required to be located behind or to the side of the principal building.

(...)

~~— (2) Unless a second driveway is If necessary to comply with the fire code, a maximum of one driveway and drive aisle shall be permitted per street frontage. The access point shall be located a minimum of one hundred feet (100') from the intersection of the front and corner side lot lines. If the front or corner side lot line is less than one hundred feet (100') in length, then the edge of the drive approach shall be located within twenty feet (20') of the side or rear property line.~~

(...)

3. Modifications to the standards of this Subsection may be granted through the design review process, subject to conformance with the standards and procedures of [Chapter 21A.59: Design Review](#).

C. Recreational Vehicle Parking:

2. Front and Corner Side Yard Parking: Recreational vehicle parking is prohibited in any required or provided front or corner side yard.

3. Rear Yard Parking: Recreational vehicles may be parked in the rear yard when they are on a hard surfaced pad compliant with surfacing standards in the Off Street Parking Standards Manual and with access provided by either a hard surfaced driveway, hard surfaced drive strips or an access drive constructed of turf block materials with an irrigation system.

4. Side Yard Parking: Recreational vehicle parking in side yards shall be allowed only when topographical factors, the existence of mature trees, or the existence of properly permitted and constructed structures prohibit access to the rear yard. The existence of a fence or other structure that is not part of a building shall not constitute a lack of rear yard access. Any recreational vehicle parking area in a side yard shall:

a. Be on a hard surface compliant with the Off Street Parking Standards Manual;

b. Be accessed via a driveway compliant with driveway standards of this chapter;

c. Not obstruct access to other required parking for the use

21A.44.070: OFF STREET LOADING AREAS FACILITIES:

A. Number and Size of Loading Areas Required:

1. Unless otherwise specified, a required an off street loading berth shall be at least ten feet (10') in width by at least thirty-five feet (35') in length for short berths, and twelve feet (12') in width by at least fifty feet (50') in length for long berths, exclusive of aisle and maneuvering space. Maneuvering aprons of appropriate width and orientation shall be provided and shall be subject to approval by the transportation director.

~~2. All loading areas shall have a vertical clearance of at least fourteen feet (14').~~

~~3. Off street loading facilities for new developments or for expansion of an existing development shall be provided at the rate specified for a particular use, or if multiple uses, at the rate of the uses combined, in Table 21A.44.070-A, "Off Street Loading Requirements". Regardless of the combination of uses, all buildings with a gross floor area over fifty thousand (50,000) square feet shall have a minimum of one (1) short berth.~~

TABLE 21A.44.070-A: OFF STREET LOADING REQUIREMENTS:			
Use	Gross Floor Area (Square Feet)	Number and Size of Berths	Vertical Clearance
Hotels, Institutions, and Institutional Living	50,000 - 100,000	1 short	14'
	Each additional 100,000	1 short	
Office/Commercial	50,000 - 100,000	1 short	
	Each additional 100,000 up to 500,000	1 short	
Retail	50,000 - 100,000	1 long	
	Each additional 100,000	1 long	
Industrial	25,001 - 50,000	1 long	
	50,001 - 100,000	2 long	
	Each additional 100,000	1 long	
Multi- Family Residential	# of Dwelling Units (Per Building)	Number and Size of Berths	
	80-200	1 short	9'
	Greater than 200	1 additional short	

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 ~~s~~ Screening of all loading berths shall be provided to comply with the requirements of [Chapter 21A.48](#), "Landscaping and Buffers". [Chapter 21A.37](#), "Design Standards".
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~~ facilities 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.

21A.44.110: NONCONFORMING PARKING AND LOADING FACILITIES:

Nonconforming parking and loading facilities shall be subject to the standards established in [Chapter 21A.38](#), "Nonconforming Uses and Noncomplying Structures", and the criteria established in this section.

A. Continuation of Nonconforming Parking and Loading Facilities: Any parking spaces, loading facilities, or ~~access to public rights-of-way~~ drive approaches that were lawfully existing or created prior to the effective date of this ordinance, but that have since become nonconforming with the provisions of this chapter through the actions of the city or any governmental entity, shall be allowed to continue, but any expansion of the use or structure, or change of use, after the adoption date of this ordinance shall comply with the provisions of this [Chapter 21A.44](#), "Off Street Parking, Mobility, and Loading".

21A.59.050: STANDARDS FOR DESIGN REVIEW:

- I. Waste and recycling containers, mechanical equipment, storage areas, and loading ~~decks~~ facilities shall be fully screened from public view and, for buildings with only one street-facing frontage, are prohibited from being located along street-facing facades. They shall incorporate building materials and detailing compatible with the building being served and shall be co-located with driveways unless prohibited by the presence of a street tree, public infrastructure, or public facility within the right of

way. Service uses may be located within the structure. (See Subsection [21A.37.050.K](#) of this title.)

21A.37.050: DESIGN STANDARDS DEFINED:

K. Screening of Service Areas: Service areas, loading ~~docks~~ facilities, refuse containers, utility meters, and similar areas shall be fully screened from public view. All screening enclosures viewable from the street shall be either incorporated into the building architecture or shall incorporate building materials and detailing compatible with the building being served. Waste and loading facilities are prohibited from being located on street-facing facades and shall be co-located and screened when possible. Exceptions to this requirement may be approved by the planning director when the service provides power or some form of utilities in and around the surrounding area. Exemptions may also be approved through the site plan review process when a permit applicant demonstrates that it is not feasible to accommodate these activities on the block interior. If such activities are permitted adjacent to a public street, a visual screening design approved by the planning director shall be required.

21A.62.040: DEFINITIONS OF TERMS:

DRIVE APPROACH: An area in the right-of-way intended to provide access for vehicles from the right-of-way to private property, including the curb return radius.

DRIVEWAY: A road or paved area on private property providing vehicular access to parking.

Attachment B: March 27th Staff Report

[The March 27th Staff Report](#)

Attachment C: March 27th Planning Commission Meeting Minutes

[The March 27th Planning Commission Meeting Minutes](#)