



24 May 2026

RE: Definition of Family Text Amendment – ELPCO Response

Dear Salt Lake City Planning Commissioners:

This letter from ELPCO, the East Liberty Park Community Organization, is in reference to the proposed Definition of Family text amendment (PLNPCM2026-00244) which updates the definition of family to eliminate any reference to relationship or number. If any number of unrelated individuals want to room together, there will no longer be any restriction on their ability to do so.

While the intent of this text amendment *may be* to make it more affordable for unrelated individuals to live together, there is no way the City will be able to ensure that landlords and/or property managers will not simply adjust to market demands to increase the rent after the first year's lease contract, similar to what we are seeing with the so called "move in" incentives that make it appear that overall affordability is being achieved, when statistically this is not the case.

We do understand that this ordinance is explicitly to make it easier for unrelated individuals such as college students, young professionals and workers to rent or buy properties together, something that ELPCO is generally supportive of. However, the image conjured is something benign and cheerful, like the 1990s sitcom "Friends."

Salt Lake City, however, is not New York. These unrelated groupings are not going to take place solely in anonymous high-rise apartment buildings, they are going to play out in family homes in residential neighborhoods that are going to become *de facto* boarding houses, similar to what we see in short-stay hotels. Unlike the situation in New York, certainly in the case of young professionals, each household member is likely to each have their own car, many will also have work trucks/work vehicles.

While the text amendment overview focuses on the potential benefits for young professionals, college students and empty nesters, there is no consideration of the impact on families with children. Does anyone doubt that four or more unrelated professionals are likely to be able to outbid a young family with one, or at most two, wage earners in the contest for the houses that fill our residential neighborhoods?

We recognize that college students with limited means benefit from the ability to share a house with other students, a practice that is already common and mostly tolerated for rentals near the universities. In these, as well as other neighborhoods, away from the colleges and downtown, the new definition will encourage landlords to fill houses with numerous workers in the low paid sectors of the economy who are working in the "various service and hospitality industries" mentioned in the Proposed Project Overview.

At a time when the City is struggling to fill its schools, it is difficult to imagine a policy more likely to push young families to the surrounding cities or more distant suburbs. Unfortunately, this is a zero-sum game. No construction is going to be encouraged by this proposal (except perhaps for these types of boarding houses). Every house sold or rented to four or five unrelated individuals is a house that is not available for occupancy by a family with children. By legalizing this practice, we will hasten the exit of such families from the City.

Additionally, while we may dislike having to anticipate an increase in nuisance complaints occurring because of this proposal, there is clear evidence to suggest that this amendment will necessitate a dramatic increase in the SLC's enforcement budget, as anticipated by the implementation of the new nuisance ordinance. The facts that there is no data to inform any decision, and no money to increase the enforcement budget as projected in the Mayor's current budget proposal, should speak volumes to decision makers.

We hope that the Planning Commission and City Council will think through the full implications of this proposal and reject it.

Thank you for your consideration.

Sincerely,

East Liberty Park Community Organization:

Kristina Robb – ELPCO Chair

Jeff Larsen – ELPCO Vice-Chair

Jeanette Young – ELPCO Secretary/Treasurer

J. Alan Crittenden – ELPCO Land Use Committee Chair

Judi Short – ELPCO Land Use Advisor

Marshall Baillie – ELPCO Sustainability Coordinator

James Birchler – ELPCO Board Member

Michael Mayo – ELPCO Board Member

David Jones – ELPCO Board Member

Janet Wade – 9th and 9th Business Liaison

About ELPCO

ELPCO is the East Liberty Park Community Organization—a local, city-sanctioned community organization that represents the residents and businesses in the East Liberty Park area of Salt Lake City. The area covered by ELPCO is defined by the boundaries of Liberty Park, 700 E to 1300 E and 800 S to 1700 S. ELPCO meets on the fourth Thursday of the month starting at 7:00 p.m..