

Good evening,

I submitted a detailed written objection, but I want to be very direct tonight about what this proposal actually is.

This is not a land use plan—it's a workaround.

The staff report explicitly states that the parcel at 2620 North is being used to create access to otherwise constrained properties. That means this rezoning is being used to solve a private access problem. The ordinance is clear: zoning amendments are not intended to relieve hardships or confer special privilege. That is exactly what is happening here.

Second, this creates a classic example of “finger zoning”—a narrow strip of industrial zoning pushed through agricultural land. That is not cohesive planning. It's a corridor. And it sets a precedent that zoning can be shaped around access problems instead of long-term planning logic.

Third, the Northpoint plan calls this area “Transitional,” meaning it should reduce conflict between industrial and residential or agricultural uses. This does the opposite. It pushes industrial activity deeper into the area and introduces an access corridor that will carry that impact directly through it.

Fourth, there are fundamental gaps in the analysis. The report acknowledges that existing access is inadequate and that sewer capacity is lacking. Yet you're being asked to support a rezone that depends entirely on solving those problems later. That's backwards. Those constraints should be resolved before changing the zoning—not after.

And finally, the so-called community benefit doesn't meet the ordinance. Even the report admits it doesn't fit the required categories. Landscaping and fencing are not community benefits—they're basic mitigation.

So when you strip this down, what's left is a parcel-specific solution dressed up as a policy decision.

If this is approved, you are setting a precedent that zoning can be used to bypass access limitations and standard subdivision requirements.

I would strongly urge you not to set that precedent. Thank you.

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Opposition to Zoning Map Amendment (PLNPCM2025-01205)

Properties: 2620 N 2200 W, 2075 W 2670 N, 2025 W 2670 N

To the Salt Lake City Planning Commission,

I am writing to formally oppose the proposed zoning map amendment from AG-2 (Agricultural) to M-1A (Northpoint Light Industrial) for the above-referenced parcels.

While I recognize the importance of long-term planning in the Northpoint area, this specific proposal does not meet the required findings for approval under the Salt Lake City Zoning Ordinance and raises significant concerns regarding land use integrity, process, and precedent.

1. The Proposal Functions as an Access Workaround, Not a Land Use Plan

The staff report explicitly states that the parcel at 2620 N 2200 W is intended to be demolished to provide vehicular access to the rear parcels. It further notes that this parcel was incorporated into the application specifically to provide an alternative means of access.

This indicates that the primary driver of the rezone is not a cohesive land use objective, but rather the resolution of a private access limitation.

The zoning ordinance is clear that amendments are **not intended to relieve particular hardships or confer special privileges**. In this case, the proposal does both by enabling access that would otherwise not be feasible under existing conditions.

2. Creation of a Linear Industrial Corridor (“Finger Zoning”)

This proposal does not represent a logical or contiguous expansion of the M-1A district. Instead, it creates a narrow, linear corridor of industrial zoning extending from 2200 West to the rear parcels.

This “finger zoning” pattern is widely recognized as poor planning practice. It introduces industrial use deep into an agricultural area without creating a coherent district boundary, undermining the integrity of both zoning districts.

3. Undermines the Purpose of the AG-2 District

The AG-2 zone is specifically intended to preserve agricultural uses and minimize conflicts between agricultural and non-agricultural uses.

By carving out a corridor through existing AG-2 land, this proposal fragments the district and increases exposure of remaining agricultural properties to industrial impacts. Rather than minimizing conflict, it introduces it.

4. Inconsistent with the Intent of the Northpoint “Transitional” Designation

The Northpoint Small Area Plan identifies this area as “Transitional,” intended to **mitigate impacts between industrial and residential/agricultural uses.**

This proposal does not create a transition. Instead, it introduces industrial zoning in a manner that increases direct conflict, particularly through the introduction of an access corridor that will carry industrial traffic through the site.

5. Inadequate Analysis of Access and Transportation Impacts

The staff report acknowledges that the existing access via 2670 N is inadequate and that a new access route must be created via 2620 N 2200 W.

However, no transportation analysis has been provided demonstrating that this parcel can safely and effectively function as an industrial access corridor.

Approving a zoning change of this magnitude without verifying access feasibility is premature and inconsistent with sound planning practice.

6. Infrastructure Limitations Remain Unresolved

The report identifies that the area currently lacks sufficient sewer capacity and that future development will require infrastructure expansion.

Rezoning to significantly increase development potential prior to confirming infrastructure adequacy is inconsistent with orderly development and may result in unforeseen public costs or delays.

7. The Proposed “Community Benefit” Does Not Meet Code Requirements

The staff report acknowledges that the proposed community benefit does not fit within the categories outlined in 21A.50.050.C.

The measures proposed—landscaping, fencing, and buffering—are mitigation

strategies, not true community benefits. These are features that would typically be required or expected during development and should not be used to justify a zoning amendment.

8. Loss of Existing Residential Use Without Replacement

The proposal includes demolition of an existing single-family home without replacement housing. This occurs at a time when the City has emphasized the importance of maintaining and expanding housing opportunities.

Removing housing while providing no residential benefit is inconsistent with broader City priorities.

9. Precedent Concerns

Approval of this request would set a precedent for using zoning map amendments to create access corridors for otherwise constrained parcels.

This could undermine subdivision standards and encourage similar piecemeal rezonings that fragment zoning districts and weaken long-term planning objectives.

Conclusion

The staff report makes clear that this proposal is driven by access constraints rather than a cohesive land use vision. It creates a fragmented zoning pattern, introduces industrial use in a manner inconsistent with transitional planning goals, and relies on unresolved infrastructure and access assumptions.

For these reasons, the proposal does not meet the required findings for a zoning map amendment and should be denied.

Thank you for your time and consideration.

Sincerely,
Chris
Souther