

KIRTON | McCONKIE

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September 21, 2026

VIA Application Portal

Salt Lake City, Planning Division
451 South State Street
Salt Lake City, Utah 84111
zoning@slc.gov

Re: Statement of Purpose and Justification for General Plan Amendment – Intermountain Hospital Skybridge, 750 South Main Street

To Whom It May Concern:

This law firm represents IHC Health Services, Inc. (“**Intermountain**”). As you know, Intermountain is the owner of certain real property located in Salt Lake City (“**City**”), Utah, which includes, among others, Parcel Nos. 16-07-103-023-0000, 15-12-233-034-0000, and 15-12-233-031-0000 (the “**Property**”). Intermountain respectfully submits this statement in support of its application for a general plan amendment (the “**Application**”). The proposed amendment is intended to authorize an enclosed pedestrian skybridge between Intermountain’s future hospital on the former Sears block (the “**Hospital**”) and the structured parking facility proposed at 750 South Main Street (the “**Parking Structure**,” and together with the Hospital and related improvements, the “**Project**”). This letter provides the purpose, justification, and supporting information required by the general plan amendment application requirements and [Section 19.06.040](#) of the Salt Lake City Code (the “**Code**”).

We note, this Application is for a narrowly tailored text amendment to the Downtown Community Plan (“**Downtown Plan**”). It would not change the downtown future land use map, any land use designation, or the density, height, permitted uses or comparable attribute applicable to any property. The proposed amendment seeks to preserve the Downtown Plan’s general policy of concentrating pedestrian activity at street level while accommodating the unique accessibility, safety, and operational needs of the Project.

Purpose and Justification

Page 64 of the Downtown Plan currently “[p]rohibit[s] sky bridges and skywalks to concentrate pedestrian activity at the street level.” While this policy may be desirable for typical downtown development, the nature of the Project creates unique considerations not shared by other commercial developments. Hospital patients commonly have impaired mobility and compromised health that can make it difficult or dangerous for them to cross outdoor right of ways. Patient visitors may also include elderly individuals or young children who will be more susceptible to the associated risks of pedestrian and vehicular traffic on Main Street. Additionally, to respond to emergencies and provide the best, most efficient care to patients, Hospital staff need to move safely and predictably at all hours and in all

conditions. The Skybridge would permit Hospital staff to move safely between the Parking Structure and Hospital regardless of snow, extreme heat, poor air quality, or other adverse conditions. Because the Project will be located in the downtown area, which generally experiences higher crime rates than surrounding residential suburbs, the Skybridge would also add an extra layer of protection for Hospital staff, doctors, nurses, and administrative staff, walking from their vehicles during night shifts or other times where there are heightened safety concerns. In sum, the Skybridge would reduce pedestrian-vehicle conflicts, improve access for persons with disabilities or other vulnerabilities, and support reliable hospital operations. The Skybridge will also not eliminate the existing pedestrian network as the Project will continue to provide street-level sidewalks, entrances, and landscaping. The Application, therefore, advances patient and pedestrian safety while preserving the General Plan's objective of preserving active, safe, and attractive pedestrian street-level environment.

Proposed Modification to the Downtown Plan

Intermountain proposes the following strike-and-underline amendments to the Downtown Plan. Deletions are shown in strikethrough and additions are underlined. Because Page 77 of the Downtown Plan contains a related prohibition on sky bridges intended to preserve view corridors, we have also included a conforming amendment to that provision to prevent internal conflict.

Page 64 – Goal 2, Initiatives: Prohibit sky bridges and skywalks to concentrate pedestrian activity at the street level, except that a sky bridge or skywalk is permitted when such sky bridge or skywalk is used in connection with a hospital, healthcare facility, or a parking structure serving such facilities.

Page 77 – Goal 5, Initiatives: Preserve view corridors of natural and architectural landmarks that terminate the vistas of our streets by prohibiting sky bridges, except as otherwise permitted in this Downtown Community Plan.

We reiterate that no map amendment, land use designation change, or change in development intensity is requested in connection with this Application.

Current Uses

The portions of the Property that will be developed into the Project are currently vacant or used for automobile-related commercial purposes.

Parcel No. 16-07-103-023-0000 (“Lot 023”), which is owned by Intermountain, contains approximately 26,0053 square feet of land. Lot 023 is currently vacant.

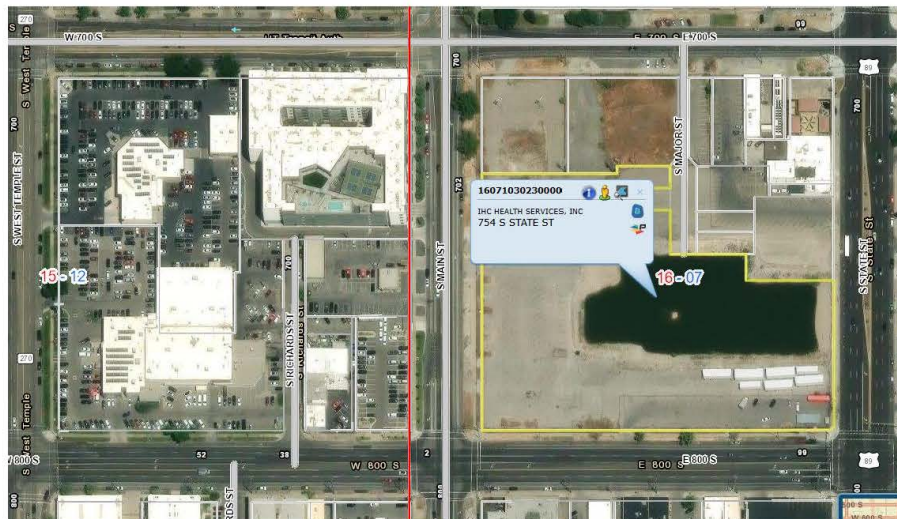
Parcel Nos. 15-12-233-032-0000 (“Lot 032”) and 15-12-233-008-0000 (“Lot 008”), which are owned by Ken Garff Enterprises, LLC (“Garff”), contain approximately 25,087 square feet of land, divided between two lots. Both Lot 032 and Lot 008 are currently used by Garff for surface parking in connection with their operation of the adjacent automotive dealerships (Ken Garff Hyundai Downtown and Ken Garff Nissan Salt Lake City).

Parcel No. 15-12-233-034-0000 (“Lot 034”), which is owned by Intermountain, contains approximately 28,750 square feet of land and approximately 4,348 square feet of building area divided between two buildings. Lot 034 is currently used as a rental-car facility operated by Hertz Car Rental.

For purposes of responding to the application requirements, the County-reported gross building area is used as an approximation of the potentially leasable area on each parcel. Accordingly, based on the County's building-area information, Lot 034 contains approximately 4,348 square feet of potentially leasable building area, and Lot 031 contains approximately 9,472 square feet of potentially leasable building area. These figures reflect gross building area reported by the County and may not constitute measured rentable or usable area under any applicable lease.

- **Lot 023:** N/A
- **Lot 032 and Lot 008:** Garff
- **Lot 034:** Hertz Car Rental
- **Lot 031:** LW Auto Body Shop

- **Lot 023, Lot 032 and Lot 008:** N/A
- **Lot 034:** Hertz Car Rental current gross rent: \$6,910/month, or approximately \$19.07/ per square foot; rent during the preceding thirty-six months: 2024: \$6,660/month, 2025: \$6,910/month, 2026: \$6,910/month.
- **Lot 031:** LW Auto Body Shop current rent: \$4,000/month, or approximately \$5.07/ per square foot; rent during the preceding thirty-six months was the same and has remained unchanged.



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reconfigured surface parking area; and associated pedestrian circulation, landscaping, lighting, utilities, and site improvements. The Project's plans and renderings submitted with Intermountain's related development applications will depict its anticipated scale and design, subject to refinement through City review and the applicable development agreement. Construction of the Parking Structure, related surface improvements, and the skybridge is anticipated to occur in coordination with construction of the Hospital and to be completed simultaneously with or near commencement of Hospital operations.

While the Project will reduce the existing rental-car and automobile-body-shop uses on Lots 034 and 031 and reconfigure the parking uses on Lots 032 and 008, Intermountain will coordinate with affected owners and occupants and comply with any applicable lease obligations and legal requirements. We note no residential occupants or dwelling units will be displaced or otherwise impacted. Intermountain generally expects the Project to be a benefit to the community, supporting surrounding property values, economic activity, and providing critical healthcare services to Salt Lake City residents. Any increase in development intensity will be appropriately mitigated through Intermountain's anticipated development agreement, applicable development standards, architectural requirements, and the City's permitting process. In addition to this Application, Intermountain anticipates seeking applications or approvals for a development agreement, an encroachment lease or other authorization for the Skybridge, and all other required planning, engineering, building, safety, and other approvals.

Community Benefits

The Code requires privately initiated general plan amendments to provide community benefits, as more particularly described in Section [19.06.070.C](#) of the Code, that would not otherwise occur absent approval of the amendment. Intermountain is a non-profit organization focused on providing healthcare services. Authorizing a direct, enclosed, weather-protected, and accessible Skybridge that will allow patients, visitors, and hospital staff to travel between the Parking Structure and Hospital—without crossing vehicle lanes at street level—will directly improve Intermountain's ability to provide quality, efficient healthcare services to Salt Lake City residents with disabilities, reduced mobility, severe illness, or other physical or medical vulnerabilities. It will also, as previously mentioned, add a layer of protection for hospital staff who need to access the Hospital during night or at other times where there are heightened safety concerns. The Skybridge will, overall, reduce pedestrian-vehicle risk and exposure, improve all-weather access to essential healthcare services, and improve long-term public health through increased access to healthcare services. These benefits are roughly proportionate to the development opportunity created by the proposed general plan amendment. The proposed amendment is limited in scope. It would not generate any additional density or other burdensome development metric. It would only modify a barrier limiting opportunities for safer and more efficient access in hospitals or other healthcare facilities. Project-specific review and all other applicable technical and design requirements will still be required. We specifically note that the Application meets the consideration factors for general plan amendments set forth in Section [19.06.070\(B\)](#) of the Code, including, without limitation:

- **Consistency with Citywide Policies.** The Application supports safe and equitable access to healthcare, efficient use of urban land, and accessibility for vulnerable persons. It acknowledges the City's preference for street-level pedestrian activity while accommodating a narrowly defined public-health and safety exception.
- **Consistency with the Downtown Plan.** The Application advances the Downtown Plan's goals for a safe, convenient, and accessible pedestrian network. The Skybridge will merely supplement the ground level sidewalks, entrances, and circulation rather than

replace them. The conforming page 77 amendment also preserves the Downtown Plan's view-corridor policy outside the limited hospital/healthcare context.

- **Significant Change Warranting Update.** The accessibility, continuous-operation, and safety needs of a hospital or healthcare facility warrant a limited exception that ordinary downtown development does not require.
- **Continuing Relevance of the Existing Policy.** The general prohibition on sky bridges and skywalks remains applicable, except for their limited use in hospitals and healthcare facilities.
- **Public Benefit and Proportionality.** As described above, the amendment enables safer, accessible, weather-protected access to essential healthcare services and supplements existing street-level pedestrian improvements. Those benefits are directly related and proportionate to a general plan amendment that does not otherwise impact density or other burdensome development metric.
- **No Residential/Business Displacement.** The proposed amendment will not displace any residents or impact dwelling units. The Parking Structure will impact but not eliminate the existing uses by Hertz Car Rental, LW Auto Body Shop, and Garff. Intermountain will work directly with such parties to mitigate impacts to their operations.
- **Impacts on Nearby Properties.** The Skybridge will introduce a new element above Main Street, but its enclosed design and project-specific review process will mitigate any visual and operational impacts. Intermountain also owns the majority of the surrounding property that would be impacted.

As set forth above, Intermountain's proposed general plan amendment supports safe access to healthcare, efficient use of urban land, accessibility for persons of differing abilities, and upholds the City's preference for street-level pedestrian activity while accommodating a narrowly defined public-health and safety need. For these reasons, Intermountain respectfully requests approval of the Application. We appreciate the City's consideration and look forward to continuing to work collaboratively with Planning staff throughout the review process. If you require additional information or documentation, please do not hesitate to reach out at the contact information set forth in the Application.

Very truly yours,

KIRTON McCONKIE

A handwritten signature in black ink, appearing to read "Ryan T. Wallace", written over a horizontal line.

Ryan T. Wallace

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September 15, 2026

VIA Application Portal

Salt Lake City, Planning Division
451 South State Street
Salt Lake City, Utah 84111
zoning@slc.gov

Re: Statement of Purpose and Justification for Zoning Amendment and Development Agreement – Intermountain Hospital Parking Garage, 750 South Main Street

To Whom It May Concern:

This law firm represents IHC Health Services, Inc. (“**Intermountain**”). As you know, Intermountain is the owner of certain real property located in Salt Lake City (“**City**”), Utah, which includes, among others, Parcel Nos. 15-12-233-034-0000 and 15-12-233-031-0000 (the “**Property**”). Intermountain respectfully submits this statement in support of its application for a zoning amendment and proposed Development Agreement (collectively, the “**Application**”). This letter provides the purpose, justification, and supporting information required by the zoning amendment application requirements and Section 21A.50 of the Salt Lake City Code (the “**Code**”).

The Application seeks approval of a Development Agreement to permit construction of a structured parking facility (the “**Parking Structure**”) serving Intermountain’s proposed hospital to be developed across the street on the former Sears block (the “**Hospital**”) and adjacent surface parking lot (the “**Surface Lot**”). The Parking Structure will be connected to the Hospital by an enclosed pedestrian skybridge, providing safe, efficient, and weather-protected access for patients, visitors, physicians, employees, emergency responders, and other Hospital users. Intermountain acknowledges that portions of the Property, specifically Parcel Nos. 15-12-233-032-0000 and 15-12-233-008-0000, are owned by Ken Garff Enterprises, LLC (“**Garff**”). As acknowledged below and in the application, Garff has consented to the requested zoning amendment, for the purposes of reorienting and redeveloping the Surface Lot, and will be a party to the Development Agreement.

Purpose and Justification

The Parking Structure is an essential component of the Hospital campus. It is anticipated to include approximately seven levels, with its size, height, and design generally depicted in the plans accompanying the Application, subject to refinement through the Development Agreement process. The Development Agreement provides the mechanism contemplated by the Code to establish the development standards applicable to the project.

The current lots owned by Garff, and future Surface Lot, remain an essential component of the automotive dealership operations (Ken Garff Hyundai Downtown and Ken Garff Nissan Salt Lake City) that are located directly west of the subject site. Proposed design is generally depicted in the plans accompanying the Application, subject to refinement through the Development Agreement process. The Development Agreement provides the mechanism contemplated by the Code to establish the development standards applicable to the project.

Without approval of the requested zoning amendment through the Development Agreement, Intermountain's ability to reorient the current lots and provide adequate structured parking in close proximity to the Hospital would be significantly impaired, which would adversely affect patient access, hospital operations, and the efficient delivery of healthcare services. Construction of the Parking Structure and Surface Lot are anticipated to occur concurrently with the Hospital and to be completed before or at the commencement of Hospital operations.

Current Uses

The portions of the Property that will be redeveloped pursuant to the proposed Development Agreement are currently used for automobile-related commercial purposes.

Parcel Nos. 15-12-233-032-0000 ("**Lot 032**") and 15-12-233-008-0000 ("**Lot 008**"), which are owned by Garff, contain approximately 25,087 square feet of land, divided between two lots. Both Lot 032 and Lot 008 are currently used by Garff for surface parking in connection with their operation of the adjacent automotive dealerships (Ken Garff Hyundai Downtown and Ken Garff Nissan Salt Lake City).

Parcel No. 15-12-233-034-0000 ("**Lot 034**"), which is owned by Intermountain, contains approximately 28,750 square feet of land and approximately 4,348 square feet of building area divided between two buildings. Lot 034 is currently used as a rental-car facility operated by Hertz Car Rental.

Parcel No. 15-12-233-031-0000 ("**Lot 031**") contains approximately 15,246 square feet of land and approximately 9,472 square feet of building area. Lot 031 is currently used as an automobile body shop operated as LW Auto Body Shop. Collectively, Lots 034 and 031 contain approximately 43,996 square feet of land and approximately 13,820 square feet of building area.

For purposes of responding to the application requirements, the County-reported gross building area is used as an approximation of the potentially leasable area on each parcel. Accordingly, based on the County's building-area information, Lot 034 contains approximately 4,348 square feet of potentially leasable building area, and Lot 031 contains approximately 9,472 square feet of potentially leasable building area. These figures reflect gross building area reported by the County and may not constitute measured rentable or usable area under any applicable lease.

The current and prior occupants of the Property are as follows:

- **Lot 032 and Lot 008:** Garff
- **Lot 034:** Hertz Car Rental.
- **Lot 031:** LW Auto Body Shop.

The current rent and rental history for the preceding thirty-six months are as follows:

- **Lot 032 and Lot 008:** N/A

- **Lot 034:** Hertz Car Rental current gross rent: \$6,910/month, or approximately \$19.07/ per square foot; rent during the preceding thirty-six months: 2024: \$6,660/month, 2025: \$6,910/month, 2026: \$6,910/month.
- **Lot 031:** LW Auto Body Shop current rent: \$4,000/month, or approximately \$5.07/ per square foot; rent during the preceding thirty-six months was the same and has remained unchanged.

Future Development

Intermountain is developing the Property to support a full-service hospital campus to serve Salt Lake City and the surrounding region. The proposed future development consists of:

- construction of the Parking Structure and Surface Lot;
- an enclosed pedestrian skybridge connecting the Parking Structure to the Hospital;
- associated pedestrian circulation, landscaping, lighting, utility, and site improvements; and
- any ancillary improvements necessary to support Hospital operations.

The Parking Structure will primarily serve hospital patients, visitors, physicians, nurses, hospital staff, emergency medical personnel, and other individuals accessing hospital services.

Requested Zoning Modifications and Offsetting Measures

The project has been designed to satisfy the Code to the greatest extent practicable, but the existing street geometry, the operational requirements of the Parking Structure and Surface Lot, and the physical constraints of the Property prevent strict compliance with the standards identified below. The Development Agreement is requested to establish alternative standards for these conditions. In each instance, the project includes design, landscaping, pedestrian, or operational measures that address the purpose of the applicable standard and offset the requested modification.

Surface Lot landscape yard. Section 21A.30.030.F.3 requires a landscaped yard at least ten feet deep along portions of a vehicle sales or lease lot's street frontage that are not occupied by a permanent structure. The existing Garff display area provides approximately five feet of landscaped yard along Main Street and 800 South, and the reconfigured Surface Lot continues that existing five-foot condition along 800 South. The constrained dimensions of the existing dealership property and the need to preserve a functional display area prevent the full ten-foot yard from being provided along those frontages. The plan offsets this condition by providing an approximately fourteen-foot-one-inch landscaped yard along Richards Street, together with additional trees, shrubs, and landscape improvements along the west edge of the project.

Sidewalk width along Main Street and 800 South. Section 21A.59.050.M.1.a(4) calls for a ten-foot-wide sidewalk in the D-2 District. The proposed sidewalks along Main Street and 800 South are approximately six feet wide because they follow the established sidewalk and curb alignments on those streets; widening them to ten feet within the present cross-section would disrupt the existing streetscape and further constrain the adjoining Parking Structure and Surface Lot. The plan instead maintains a continuous, direct pedestrian route aligned with the sidewalks on the adjacent blocks and supplements it

with the enclosed skybridge, the midblock walkway, and a separate walkway on the west side of the Parking Structure.

Park-strip width along Main Street and 800 South. Section 21A.59.050.M.2 and the applicable City public-improvement standards contemplate park strips wider than the existing park strips along Main Street and 800 South. The project retains the existing widths and alignments because the established curb-to-property-line cross-sections do not provide enough space to accommodate the contemplated park strips and sidewalks without relocating existing street improvements or materially reducing the usable development area. As an offset, the project preserves a consistent frontage condition, adds landscaping associated with the Surface Lot and midblock walkway, and provides street trees and shrubs along the Richards Street edge.

Building-base height. Section 21A.59.050.D.2 provides that a building taller than fifty feet should have a distinct base at least twenty feet high. The approximately seventy-one-foot-ten-inch Parking Structure uses a ten-foot base because a twenty-foot base is not compatible with the functional floor and facade organization of the garage and would be out of scale with the adjacent multi-unit residential building to the north. The ten-foot base nevertheless creates a pedestrian-scaled street wall and is reinforced by an active retail storefront, transparent ground-floor glazing, pedestrian entrances, an awning, changes in materials, and architectural detailing.

Midblock-walkway setback. Section 21A.59.050.H calls for parking structures to be set back at least twenty-five feet from required midblock pedestrian access locations. The required midblock walkway is immediately adjacent to the Parking Structure because a twenty-five-foot building setback would materially reduce the footprint and efficiency of the structured parking needed to serve the Hospital. The principal vehicle entrance is, however, located more than twenty-five feet from the walkway, and the plan provides a four-foot landscape buffer between the building and the walkway's clear six-foot path, together with lighting, seating, and vegetation to protect and enhance the pedestrian realm.

Upper-floor glass. Table 21A.37.060 requires glass over fifty percent of the applicable upper-floor area of a street-facing facade, while the upper levels of the Parking Structure provide no glass. The garage must remain open for natural ventilation and must conceal parked vehicles and drive ramps; applying fifty percent glazing to unoccupied parking levels would conflict with those functional and screening requirements. The plan offsets the absence of upper-floor glass with one hundred percent durable upper-floor facade materials, a decorative perforated-metal screen, changes in color and pattern, and approximately sixty-three percent glass and openings at the active ground floor.

Parking-garage facade articulation. Section 21A.59.050.L.3 calls for an architectural element at intervals of no more than forty feet along a parking-garage facade adjoining a public street or public open space. The proposed perforated-metal feature extends for more than forty feet because it is designed as a cohesive, large-scale graphic integrated with the garage screening and structural rhythm; dividing that feature into literal forty-foot segments would interrupt the intended composition. The facade still avoids visual monotony through the perforated graphic, variations in material, color, and texture, and a distinct north-end mass with an approximately four-foot-four-inch plane change and a thirteen-foot roofline change.

Richards Street public improvements. To the extent Richards Street is treated as a public street, Sections 21A.59.050.M.1.a(4) and 21A.59.050.M.2 would call for sidewalk, curb, gutter, and park-strip

improvements that cannot all fit within its approximately forty-one-foot right-of-way. Richards Street is a dead-end facility that functions as an alley, and its limited width makes the full public-street cross-section physically impracticable. The plan nevertheless adds curb and gutter aligned with the existing return at 800 South, provides a five-foot pedestrian walkway on private property along the west side of the Parking Structure, and landscapes the area between the property line and back of curb with street trees and shrubs.

Anticipated Impacts

The redevelopment of the Property, into an integral component of the Hospital campus, will provide substantial public benefits while minimizing impacts on surrounding properties and neighboring businesses. As critical hospital infrastructure, the Parking Structure will:

- consolidate parking within a structured facility, reducing circulation conflicts;
- improve pedestrian safety through the enclosed skybridge;
- improve traffic operations associated with hospital access; and
- support property values and economic activity through continued investment in the Property.

Any increase in development intensity will be appropriately mitigated through the Development Agreement, applicable development standards, architectural requirements, and the City's permitting process. In addition to this Application, Intermountain anticipates obtaining all remaining land use, engineering, utility, and building approvals necessary to complete the Hospital campus. Intermountain will also be submitting a separate application for a development agreement relating to the Hospital and an Encroachment Lease application for the pedestrian skybridge.

Community and Planning Benefits

The Code requires privately initiated zoning amendments to provide community benefits that would not otherwise occur absent approval of the amendment. The redevelopment of the Property will directly support the Hospital's ability to provide expanded healthcare services by ensuring adequate parking for patients, visitors, physicians, nurses, and hospital personnel, while also maintaining continuity of service neighboring businesses. It will also increase access to critical medical services for residents throughout Salt Lake City and the surrounding area.

The project will also: (i) improve pedestrian safety and connectivity through the enclosed skybridge; (ii) reduce conflicts between pedestrians and vehicles via improved access for structured and surface parking; (iii) support long-term employment associated with Hospital operations; (iv) enhance the appearance of the Property through high-quality architectural design and façade treatments; and (v) improve long-term public health through increased access to healthcare services.

More broadly, the project advances the City's planning objectives by encouraging investment in institutional infrastructure, supporting a major employment center, promoting efficient urban land use through structured rather than surface parking, facilitating redevelopment of an underutilized urban site, and improving access to essential public services. Accordingly, the requested zoning amendment is consistent with the considerations set forth in Section 21A.50.050 of the Code.

For these reasons, Intermountain respectfully requests approval of the Application and the accompanying Development Agreement. We appreciate the City's consideration and look forward to continuing to work collaboratively with Planning staff throughout the review process. If you require additional information or documentation, please do not hesitate to reach out at the contact information set forth in the Application.

Very truly yours,

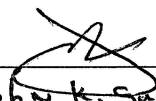
KIRTON McCONKIE



Ryan T. Wallace

Acknowledged and consented to:

KEN GARFF ENTERPRISES, LLC,
a Utah limited liability company

By: 
Name: John K. Garff
Its: Manager