SNELL
& WILMER

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

Re: Zoning Map Amendment Application Request for the Property Located at 780 Guardsman Way

Dear Planning Division Staff,

On behalf of the joint applicants, the property owner and Greystar (collectively, the "Applicant"), I am pleased to submit the enclosed "Zoning Amendment Application" for the property located at 780 Guardsman Way (Exhibit A), at the northwest corner of Guardsman Way and Sunnyside Avenue, otherwise known as Salt Lake County Assessor's Office Parcel Numbers (APN's) 16091260100000 & 16091260110000 (cumulatively, the "Property"). The Property is currently operating as a special education school under the Carmen B. Pingree Autism Center of Learning (plans to relocate are underway).

The overall Property is approximately 5.33 acres and is within the Institutional ("I") zoning district. The purpose of this letter is to provide a summary of the proposed project as detailed in the enclosed materials. The Applicant intends to rezone the Property via Salt Lake City's Zoning Map Amendment process from its current "I" zoning classification to a "Mixed Use 6" ("MU-6").

A. Project Overview

The Applicant proposes to redevelop the Property with a purpose-built student housing community serving the University of Utah, consisting of approximately 345 units and 1,010 beds (the "Project"), see Conceptual Site Plan (Exhibit B) and Conceptual Elevations (Exhibit C).The Project is conceptually designed as a five-story residential building organized around two landscaped courtyards, which would include a pool, spa, a rooftop lounge, and outdoor recreation areas for student residents. A structured parking garage with approximately 500 stalls would be located internal to the site and screened and wrapped by residential units so that the garage is not visible from the adjacent public streets. The ground level lobby, leasing office, fitness center, and amenity space will be oriented toward the Guardsman Way frontage to activate the street and provide a clear, pedestrian-oriented front door to the community.

The Project offers a range of unit types, from one-bedroom through five-bedroom units, to accommodate a variety of student household sizes and price points. Based on the proposed 345 units on the 5.33-acre Property, the Project would have a residential density of approximately 65 d.u./ac. The building massing is broken into distinct segments by 20-foot building breaks along the street frontages to reduce perceived scale and add visual interest to ultimately meet the maximum length of street facing façade design code requirements. Based on the current conceptual architectural drawings, the top of roof

is proposed at approximately 56'-4", where the Property slopes down towards the sidewalks along both Guardsman Way and Sunnyside Avenue.

Ingress/Egress is proposed via existing curb cuts, with the primary entrance from Guardsman Way and secondary/emergency access from Sunnyside Avenue. Vehicular access to the parking garage will be provided by ramps internal to the structure, and the conceptual site plan includes a dedicated move-in/loading area, a drop-off area, service and trash facilities located off the public frontage, and a fire lane/access road along the northern and western property line adjacent to the Rowland Hall property. These features are designed to accommodate the concentrated move-in periods typical of student housing without disrupting traffic on Guardsman Way or Sunnyside Avenue.

B. Request

The Applicant requests an amendment to the Salt Lake City Zoning Map to change the zoning designation of the Property from "I" to "MU-6". No amendment to the text of the Zoning Ordinance is requested. A map showing the current use of the Property and adjacent properties is enclosed as (Exhibit E). The Property is bordered by Guardsman Way to the east, Sunnyside Avenue to the south, and the Rowland Hall property to the (north and west). Sunnyside Park is also located directly across Guardsman Way and the University of Utah's main campus less than ½ mile north of the Property.

C. Purpose and Justification

The current "I" zoning does not accommodate the proposed residential development. The amendment process exists to make adjustments necessary in light of changed conditions or changes in public policy, and both are present here: the existing special education school is relocating, making the Property available for redevelopment, and the City's adopted housing policies call for additional affordable housing, which includes student housing. Rezoning to MU-6 will allow an underutilized institutional site to be repurposed for much-needed student housing within walking and biking distance of campus.

MU-6 Zoning Building Form Standards (Salt Lake City Code, Table: 21A.25.050.C.3). The future student housing as a multi-family residential development will meet the following minimum and maximum form standards per City Code:

Building Regulation	**Regulation for Building Form: Multi-family Residential/Storefront/Vertical Mixed-Use**
Height	Maximum: 65 feet.
Front and Corner Side Yard	1. Ground Floor Occupied by Residential Uses: a. Minimum: 10 feet. b. Maximum: 20 feet. 2. Ground Floor Occupied by Non-Residential Uses: a. Minimum: None, except 5 feet on North Temple and 10 feet on 400 South.

	b. Maximum: 10 feet, except 15 feet on North Temple and 20 feet on 400 South.
Interior Side Yard	Minimum: None. When the interior side yard abuts an R-1, R-2, FR, SR, FB-UN1, RMF-30, RMF-35, MU-2, or MU-3 zone, the minimum is 10 feet.
Rear Yard	Minimum: 10 feet. When the rear yard abuts an R-1, R-2, FR, SR, FB-UN1, RMF-30, RMF-35, MU-2, or MU-3 zone along the rear lot line, the minimum is 20 feet.
Open Space Area	As required in Subsection 21A.25.010.D.
Midblock Walkway	All new buildings shall provide a midblock walkway if a midblock walkway on the subject property has been identified in an adopted city plan, subject to the requirements of Subsection 21A.25.010 .E "Midblock Walkways."

Consideration Factors (Salt Lake City Code, Sec. 21A.50.050.B). The proposed map amendment satisfies the factors the City Council should consider, as follows:

1. Consistency with Adopted Plans: As discussed in Section D below, the amendment is consistent with the purposes, goals, objectives, and policies of the City's adopted planning documents.

2. Purpose Statements of the Zoning Ordinance: The MU-6 district purpose language includes development of mid-rise buildings, generally six (6) stories or less in height.

3. Effects on Adjacent Properties: The Project has been designed to minimize impacts on adjacent properties. Structured parking is screened and wrapped by units, while service, trash, and loading functions are located away from the public frontage. Also, building breaks would reduce the scale of the street walls, and a fire lane/access road provides separation from the Rowland Hall property.

4. Overlay Districts: The Property is not located within an overlay zoning district.

5. Utilities: The Applicant will coordinate with Salt Lake City Public Utilities to confirm that adequate drinking water, storm water, and sewer capacity is available to serve the Project, and will construct improvements required to serve the development.

6. Transportation Facilities: The Property is served by Guardsman Way and Sunnyside Avenue. Because residents will be students at the nearby University of Utah, many trips are expected to be made on foot, by bicycle, or by transit rather than by personal vehicle. Unlike many existing off-campus housing

facilities located west of 1300 East—which require students to climb steep slopes to access the campus—the Property's location on Guardsman Way features minimal elevation changes. This flatter terrain simplifies walking and cycling, actively encouraging residents to utilize alternative transportation methods rather than driving.

The Property offers convenient transit access to UTA's Bus Route 9, which features stops along Guardsman Way. Operating as a high-frequency route with 15-minute headways during peak hours, Route 9 provides direct connections to the university, light-rail lines, and popular off-campus amenities—including Liberty Park and the 9th & 9th neighborhood's retail and dining district. Additionally, all university students receive a complimentary UTA transit pass. The Applicant is in the process of having an appropriate traffic study prepared for the Property as discussed during a Development Review Team (DRT) meeting and will address any improvements it identifies.

7. Proximity to Amenities: Future residents will be able to reach the University of Utah campus, along with adjacent Sunnyside Park, the nearby Salt Lake City Sports Complex, open space/trails, and other amenities without relying on a personal vehicle.

8. Public Safety Resources: The Project will not impact public safety resources. Anticipated design includes a fire lane/access road, and the building will be fully sprinklered and built to current building and fire codes.

9. Residential Displacement: No existing housing is located within the boundary of the proposed amendment, so no residents will be displaced, and no residential units will be demolished. In fact, the opposite will be true with the proposed student housing option.

10. Business Displacement: The Property is currently occupied by the Carmen B. Pingree Autism Center of Learning with plans for relocating to a location to be determined.

11. Community Benefits: The community benefits proposed in connection with this amendment are described in Section E below.

D. Consistency with Adopted Plans

The proposed amendment is consistent with the purposes, goals, objectives, and policies of the City's adopted planning documents, including Plan Salt Lake (adopted December 1, 2015), Housing SLC (2023-2027), and the East Bench Master Plan (adopted February 21, 2017). Some examples of these are provided below:

Plan Salt Lake:

- Growth Initiatives 1, 3, and 6: "Locate new development in areas with existing infrastructure and amenities"; "Promote infill and redevelopment of underutilized land"; and "Accommodate and promote an increase in the City's population."

- Sustainable Growth & Development: Density in appropriate locations "allows people to live closer to where they work, recreate, shop, and carry out their daily lives, resulting in less automobile dependency and greater mobility."

- Housing Initiative 4: "Direct new growth toward areas with existing infrastructure and services that have the potential to be people-oriented."

- Transportation & Mobility Initiative 4: "Reduce automobile dependency and single occupancy vehicle trips."

- Air Quality Initiative 3: "Increase mode-share for public transit, cycling, walking, and carpooling."

Housing SLC:

- Goal 1: "Make progress toward closing the housing gap of 5,500 units of deeply affordable housing and increase the supply of housing at all levels of affordability."

- Goal 1 Metric: "Entitle 10,000 new housing units throughout the city."

East Bench Master Plan:

- The community is home to "regionally significant institutional facilities and employment centers, such as the University of Utah and Research Park."

- Existing institutional uses in the area include "University of Utah student housing," and the Plan identifies a University of Utah shuttle stop at the existing student housing complex on the north side of Sunnyside Avenue.

- The Plan supports Plan Salt Lake initiatives to "increase the number of medium density housing types and options", and to "locate new development in areas with existing infrastructure and amenities, such as transit."

E. Community Benefit

Salt Lake City requires every zoning map amendment application to include a proposed community benefit that would not otherwise be available without the amendment and that is roughly proportional to the increase in development potential. Among the community benefits identified by the City is "Support for Local Businesses," defined as the "Inclusion of space for small businesses or charitable organizations within a development." The Applicant proposes the following community benefit:

Lucky Ones Coffee. The Applicant will partner with Lucky Ones Coffee to provide a café location within the Project area. Lucky Ones Coffee is a Utah 501(c)(3) nonprofit café that exists to create meaningful employment, workforce development, and brighter futures for individuals with disabilities.

Founded in Park City in 2017, Lucky Ones currently operates cafés in Park City and in Salt Lake City's Marmalade neighborhood, along with a mobile coffee truck, and provides more than 38,000 hours of supported employment each year. A new location within the Project would allow Lucky Ones to expand paid job training and employment opportunities for people with disabilities on the east side of Salt Lake City while providing another amenity to the future student residents and the public alike.

The current "I" zoning does not accommodate the proposed development, and the subsidized café space would not be provided absent the amendment, which meets the requirement of a "benefit not otherwise available". The café will add a publicly accessible neighborhood gathering place near the University of Utah, Rowland Hall, and surrounding neighborhoods, and will continue the Property's long-standing service to individuals with disabilities following the relocation of the Carmen B. Pingree Autism Center of Learning.

F. Conclusion

The proposed rezoning from "I" to "MU-6" will allow an institutional site to be redeveloped as a high-quality, purpose-built student housing community serving the University of Utah. The amendment is consistent with the City's adopted plans, satisfies the consideration factors set forth in Section 21A.50.050.B, will not displace any residents, and will provide a meaningful community benefit. For these reasons, the Applicant respectfully requests that Planning staff recommend approval, and that the Planning Commission and City Council approve the proposed Zoning Map amendment.

We look forward to working with you and the community as we progress through the rezoning process. Should you have any questions, please feel free to contact me at your convenience.

Respectfully submitted,

Snell & Wilmer L.L.P.

/s/ Wade R. Budge

Wade R. Budge

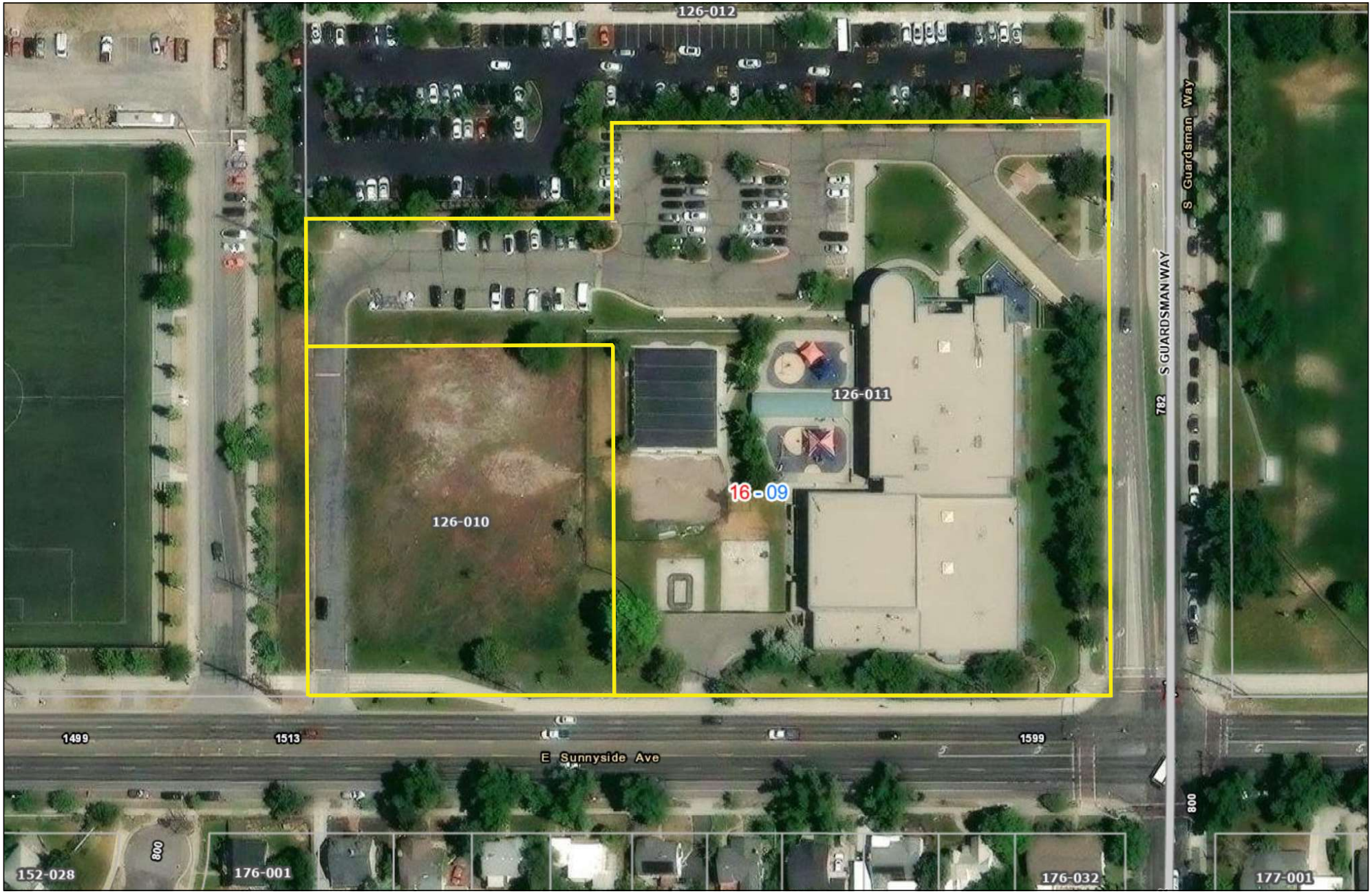
Exhibits:

Exhibit A: Aerial Map
Exhibit B: Conceptual Site Plan
Exhibit C: Conceptual Elevations
Exhibit D: Lucky Ones Coffee
Exhibit E: Land Use Map

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Exhibit A
Aerial Map



SNELL & WILMER	N	Aerial	Exhibit A 780 Guardsman Way October 2026

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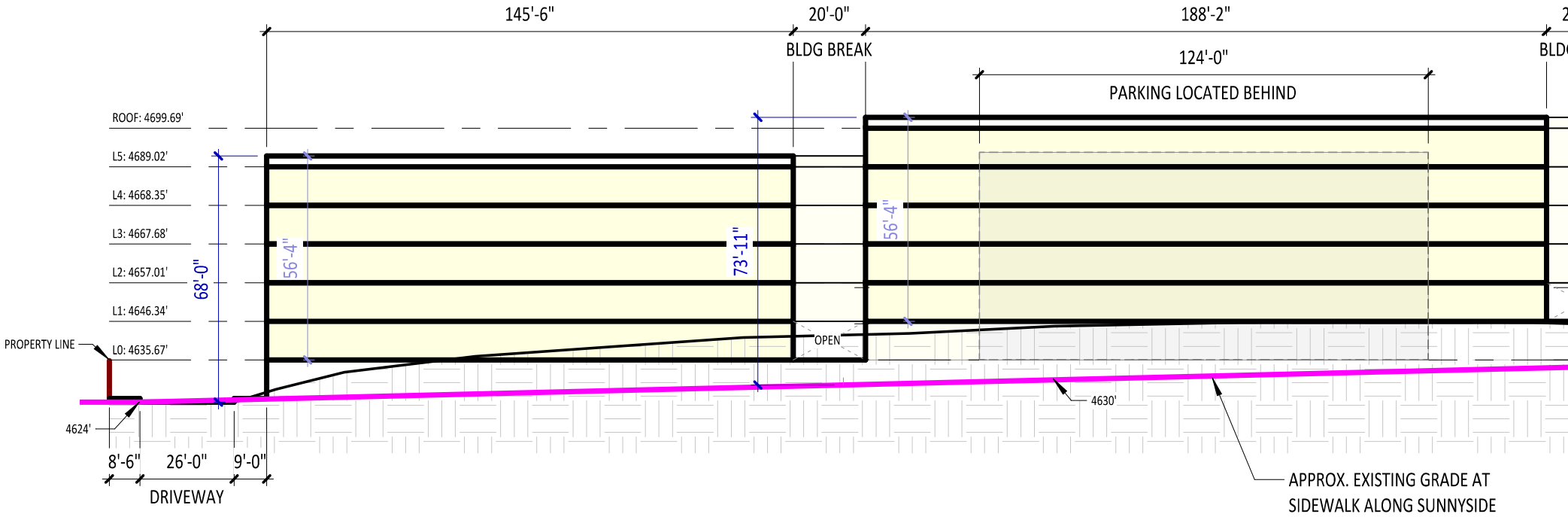
Exhibit B
Conceptual Site Plan

L1 PARKING:
88 SPACES
PARKING
RAMP
UP
RAMP
DOWN
TR
TRASH ROOM
BELOW
RESIDENTIAL
LANDSCAPED
COURTYARD
MOVE-IN/LOADING
5BR
4BR
2BR
1BR
242'-0"
190'-0"
125'-0"
105'-5"
113'-3"
59'-1"
53'-0"
49'-6"
26'-0"
24'-6"
24'-7"
37'-6"
7'-5"
13'-5"
15'-0"
8'-6"

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Exhibit C
Conceptual
Elevations



1
MP2

SOUTH ELEVATION - DIAGRAM

1" = 40'-0"

1 / A1.0




UNIVERSITY
UTAHUTES

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Exhibit D
Lucky Ones
Coffee

Lucky Ones
COFFEE



fueled by coffee focused on futures

- 1 in 5 adults has a disability — **80% are unemployed.** changing that.
- **42,000 hours of supported employment** delivered i
- **40 neurodiverse baristas** thriving in our coffee sh
- **Employment = purpose + community + paycheck** for underemployed population.
- After age 21, many lose government support. **We ar village families turn to.**
- **Job Skill Trainings:** Partner programs come into our after hours to learn teaching real, transferable job s
- **Advocacy & representation:** Amplifying the disab community's voice in policy and public forums.
- Family resources: Helping parents guide young child **understanding disability and fostering inclusi**
- **Our cafés fund 80% of programs**, with donors help expand opportunities and build futures

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Exhibit E
Land Use Map



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1 East Washington Street, Suite 2700, Phoenix, AZ 85004

N

Current Land Use

Exhibit E

780 Guardsman Way

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