

BARRIERS AND DESIRED OUTCOMES

RMF-35 & RMF-45 ZONING DISTRICTS ANALYSIS



Abstract

INTRODUCTION

This document attempts to comprehensively study Salt Lake City's RMF-35 and RMF-45 zoning districts. Adopted in 1995, these districts were meant to foster moderate- to high-density housing compatible with existing neighborhoods. However, **Planning staff's analysis in this report finds that neither district has achieved its intended objective. Instead, numerous barriers in the zoning code have prevented development patterns typically associated with moderate- to high-density housing.**

BACKGROUND AND PURPOSE

The RMF-35 and RMF-45 districts are meant to support a variety of housing types while allowing new development that can fit the character of existing neighborhoods. The districts differ primarily in permitted building height: RMF-35 allows for buildings up to 35 feet, while RMF-45 allows up to 45 feet. However, since the districts were adopted in 1995, new developments have mainly consisted of large condominiums or single-family dwellings rather than the medium-density residential infill originally envisioned.

CURRENT ISSUES

Planning staff identified several development process challenges within these zoning districts, including:

- **Minimum Lot Area and Width:** A significant portion of lots (66%) do not meet the minimum lot width requirement of 50 feet, and 47% are smaller than 5,000 square feet, below the area required for new development. As a result, many existing lots do not comply with current regulations.
- **Density Restrictions:** Over 60% of the lots in both districts exceed current density limitations. Moreover, only 4% of the lots have been developed since the districts were established, highlighting the districts' ineffectiveness in promoting housing opportunities.
- **Parking Requirements:** The districts require significant off-street parking (1 to 1.25 spaces per unit), even though nearly all lots are within a quarter mile of public transit. These mandates often increase development costs and reduce the number of possible housing units in a development.

NONCOMPLYING LOTS AND NONCONFORMING USES

Findings in this study note that many properties in these districts are considered legally noncomplying because they do not meet current dimensional standards, such as minimum lot area, setbacks, and building height. Additionally, nonconforming uses—existing buildings established before current zoning regulations—complicate redevelopment efforts. **Most noncomplying properties were established before the 1995 changes, and many have faced barriers to maintenance, improvement, or redevelopment.**

DEVELOPMENT PATTERNS AND HOUSING TYPES

Since their adoption, there has been limited development within the RMF-35 & -45 districts. Only 4% of lots within the two districts were developed under the current standards. Single-family dwellings were a significant proportion of that development (73%), while multi-family housing accounts for only a small fraction. **The study highlights that only 19 multi-family buildings (with three or more units) have been built since 1995, representing just 23% of new development—in stark contrast to the districts' purpose to encourage “a variety of housing types.”**

BARRIERS TO NEW DEVELOPMENT

The primary barriers to achieving the intended development patterns include:

- **Lot Dimension Requirements:** Most lots do not meet the minimum lot area and width standards, particularly for multi-family housing. For example, multi-family developments require a minimum of 9,000 square feet, but the average lot size in RMF-35 is only 7,957 square feet, and many lots are much smaller.
- **Parking Standards:** Despite their proximity to public transit, more than one parking space is required per unit with two or more bedrooms, adding unnecessary costs and limiting the number of units created.

WATER USE AND ENVIRONMENTAL CONSIDERATIONS

The study also addresses water use in urban areas, particularly in arid regions like Salt Lake City. Higher-density development can reduce water consumption per capita by clustering homes closer together and reducing landscaped areas. **Encouraging moderate-density housing aligns with water conservation goals, making more efficient use of existing infrastructure and minimizing environmental impacts.**

POLICY RECOMMENDATIONS

Based on the analysis, the study presents several recommendations to promote the intended development patterns in the RMF-35 and RMF-45 districts:

- 1. Merge the Two Districts:** Combining the RMF-35 and RMF-45 districts would streamline the zoning code and eliminate the nearly inconsequential differences between them.
- 2. Relax Minimum Lot Area and Width Requirements:** Reducing minimum lot size and width requirements would allow new development that better reflects the districts' intended mix of housing types and densities.
- 3. Reduce Parking Requirements:** Given the proximity to public transit, parking mandates should be lowered, especially for properties near transit hubs and business districts. This could make housing more affordable by reducing the need for parking infrastructure.
- 4. Encourage Diverse Housing Forms:** Allowing more housing types, such as rowhouses, duplexes, and cottage developments, would provide options for infill development that could fit within Salt Lake City's eclectic mix of neighborhoods that vary in style, scale, and density.
- 5. Promote Affordable Housing:** The city should offer incentives for developers to build affordable housing units and encourage adaptive reuse of existing buildings to preserve naturally occurring affordable housing.
- 6. Revise Density Regulations:** Current density limitations are overly restrictive, and adjusting these to allow for more units per acre could help meet housing demand while maintaining neighborhood character.

CONCLUSION

The RMF-35 and RMF-45 districts have largely failed to meet their intended goal to provide moderate- and high-density housing. The stringent lot requirements, density limits, and parking mandates create barriers to new development and hinder the creation of affordable, transit-accessible housing. **Planning staff recommendations in this report would help align the zoning districts with the city's broader goals of promoting diverse, affordable, and sustainable housing.** Through these recommended reforms, the city could better achieve its housing goals while preserving neighborhood character and improving livability.

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Introduction

PROJECT BACKGROUND

The RMF-35 (Moderate Density Multi-Family) and RMF-45 (Moderate/High Density Multi-Family) districts were adopted in 1995 with the common purpose of providing an environment suitable for a variety of moderately dense housing types compatible with the existing scale and intensity of surrounding established neighborhoods. Functionally, **the two districts are nearly identical with the exception of building height** (The RMF-35 district generally permits buildings up to 35 feet in height, while the RMF-45 district allows buildings up to 45 feet).

When the districts were adopted, many existing medium-density multi-family buildings throughout the city were designated RMF-35 or RMF-45. Since that time, the majority of development in the two districts has consisted of large condominium buildings and single-family dwellings, with only a handful of the intended moderate-density residential infill.

This study explores development patterns within the RMF-35 and RMF-45 districts to determine why and how the zoning code may be preventing medium/medium-high-density housing development. The research presented in this study show that the RMF-35 and RMF-45 districts have not effectively promoted the type of medium-density housing infill development initially intended.

Furthermore, many of the vacant or underutilized properties in these districts do not meet the minimum dimensions for new development, meaning any new redevelopment would require an additional planning process such as a Zoning Map Amendment or a Planned Development to modify requirements like minimum lot width, lot area, or parking.



Staff's preliminary recommendations based on the research presented include:



KEY TAKEAWAYS

- 66% of the lots within the two districts do not meet the minimum width requirement for new development.
- 47% of the lots are smaller than 5,000 square feet and do not meet the lot area minimum for new development.
- 61% of the RMF-35 lots and 58% of the RMF-45 lots exceed the current density limitations.
- Only 4% of the RMF-35 and RMF-45 lots have been developed post-1995 under the existing regulations.
- Roughly 96% of lots within the RMF-35 and RMF-45 district have access to public transit within 1/4 mile.



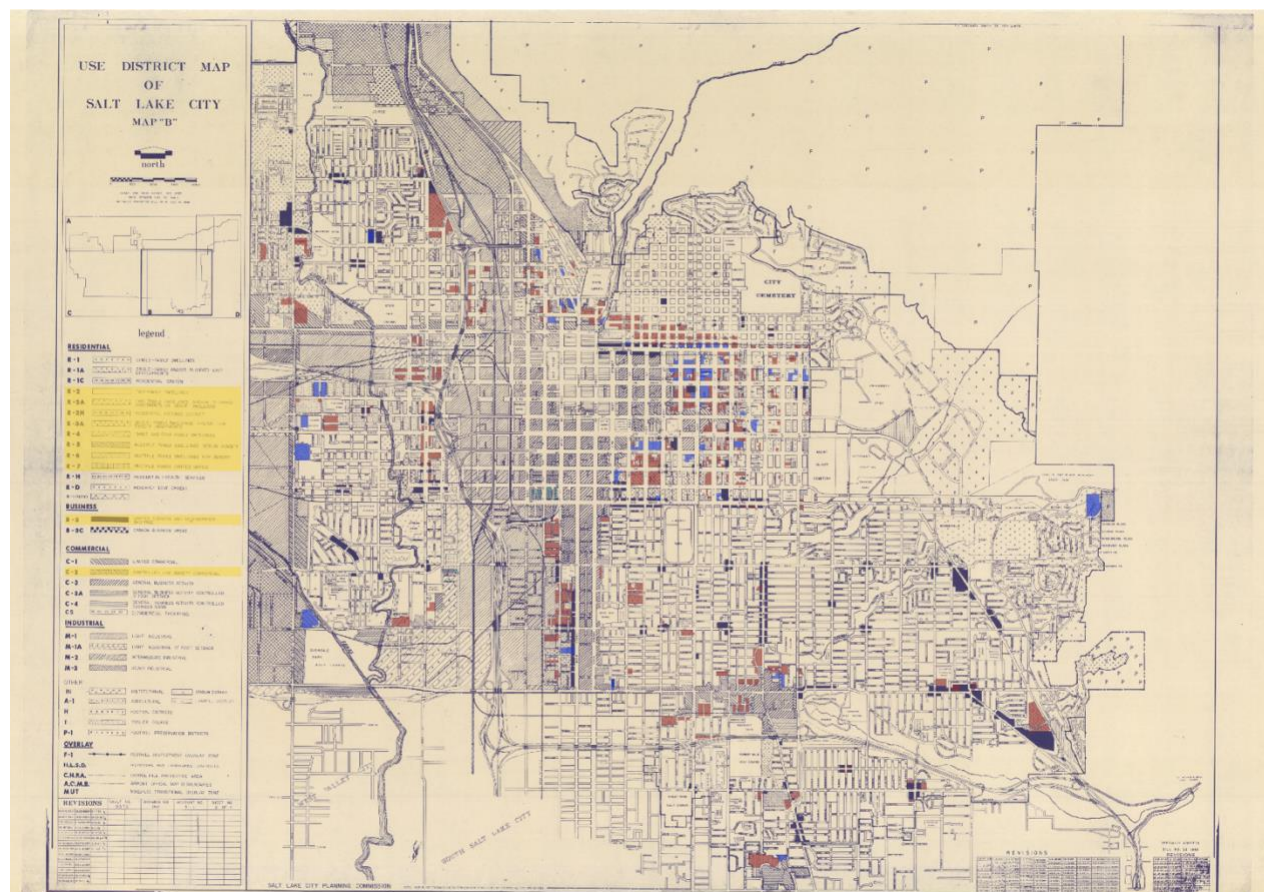
RECOMMENDATIONS

- Combine the two districts.
- Remove the minimum lot width requirements.
- Reduce the minimum area required for new development.
- Evaluate required setbacks for new development.
- Allow multiple residential building forms such as cottage development and rowhomes.
- Provide incentives for Affordable Housing and Adaptive reuse to preserve naturally occurring affordable housing stock.
- Provide incentives for family-sized housing units.
- Where appropriate, reduce the minimum parking requirement, especially adjacent to transit and business nodes.
- Include design standards to ensure infill development is compatible with existing neighborhoods.



Current Conditions

HISTORY



The map above includes two elements; the basemap and an overlay. The basemap is the zoning map that was in place prior to the adoption of the new zoning code. Overlaid on top, are the RMF-35 (red) and RMF-45 (blue) districts as they existed in 1995.

The RMF-35 and RMF-45 districts were first introduced in 1995 with the adoption of Chapter 21A and an updated zoning map. As shown in the map above, the RMF-35 (in red) and RMF-45 (in blue) districts did not necessarily replace any specific district. Properties designated RMF-35 or RMF-45 in 1995 could have been previously zoned as one of eight residential or two commercial districts, as highlighted in yellow on the map. The residential districts range from the “Two Family Dwelling” district to the “Multiple Family Dwellings High Density” district.

The parcels rezoned to one of the two RMF districts typically consisted of existing multi-family developments. However, many of the properties did not meet the new standards established by the change.

Before 1995, zoning districts were generally applied by block rather than individual parcels. This is reflected on the base map above in areas such as Central City, bounded by South Temple, 900 S, 500 E, and 1000 E. The base map above (made during this time) shows zoning districts applied to entire blocks or block faces regardless of property lines.

When Chapter 21A was adopted in 1995, the city had the capabilities of computer-drawn maps, which allowed each parcel to be zoned separately, causing many blocks to be “carved up” with multiple zoning designations for the first time. This may be one of the reasons the RMF-35 and RMF-45 districts were only applied to certain parts of a block when, previously, the whole block may have been given the same zoning designation.

Based on their piecemeal application, it appears the districts may have been mapped to preserve existing multi-family housing rather than to promote the creation of new moderate-density multi-family housing in these areas—out of line with the goals laid out in their respective purpose statements.

CURRENT LAND USE PATTERNS

Since the adoption of RMF-35 and RMF-45 districts, only 83 of the 2,181 lots with these districts (or 4%) have been developed¹. This means the majority of lots within these two districts may not meet the standards staff uses today. Of the lots developed after the adoption of RMF-35 and RMF-45, 73% are single-family homes and townhomes. **Only 19 multi-family buildings have been constructed within the RMF-35 and RMF-45 districts since their creation, equating to roughly 23% of new development.**

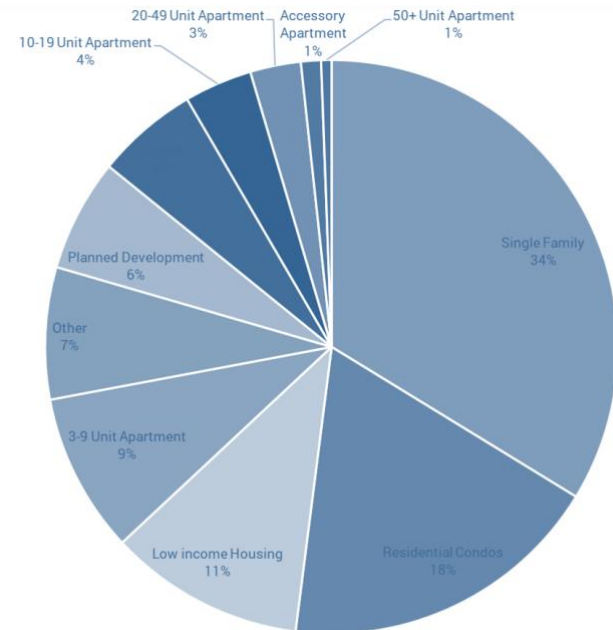
The apparent intent of both the RMF-35 and RMF-45 districts, as laid out in their purpose statements, is to promote a variety of housing types (such as single-family, two-family, and multi-family). Ideally, they are meant to serve as a transition from low-density neighborhoods to higher-intensity areas or allow multi-family development to be seamlessly integrated into existing neighborhoods. Regulations such as height limitations and landscape buffers were designed to promote development consistent with the surrounding neighborhood's scale and character.

¹ To determine what has been developed within these districts since the adoption of RMF-35 and RMF-45, staff pulled data from the county's year-built records. The data starts in 1996 to ensure buildings constructed in 1995 but prior to the code changes were not included in the data set. The data is broken down by the type of residential use and the number of lots that were developed in each. Also included are the total number units that were built within each category.

Contrary to the districts' intent, only 24% of properties in the RMF-35 and RMF-45 districts today are associated with moderate-density multi-family housing (ranging from duplexes to 20-unit apartment buildings)². Apartments with 3-9 units account for roughly 9% of total units. Single-family houses, duplexes, and townhouses make up roughly 46% of development within these two districts.

Type Of Use	Built Since 1996
Single Family Detached	34 Lots 34 Units Total
Duplex	3 Lots 6 Units Total
Townhome	27 Lots 226 Units Total
3 - 4 Unit Apartment	2 Lots 8 Units Total
5 - 9 Unit Apartment	1 Lot 8 Units Total
10 - 19 Unit Apartment	2 Lots 35 Units Total
20 - 49 Unit Apartment	11 Lots 407 Units Total
50 - 98 Unit Apartment	3 Lots 187 Units Total

**All Existing Land Uses
in the RMF-35 & RMF-45**

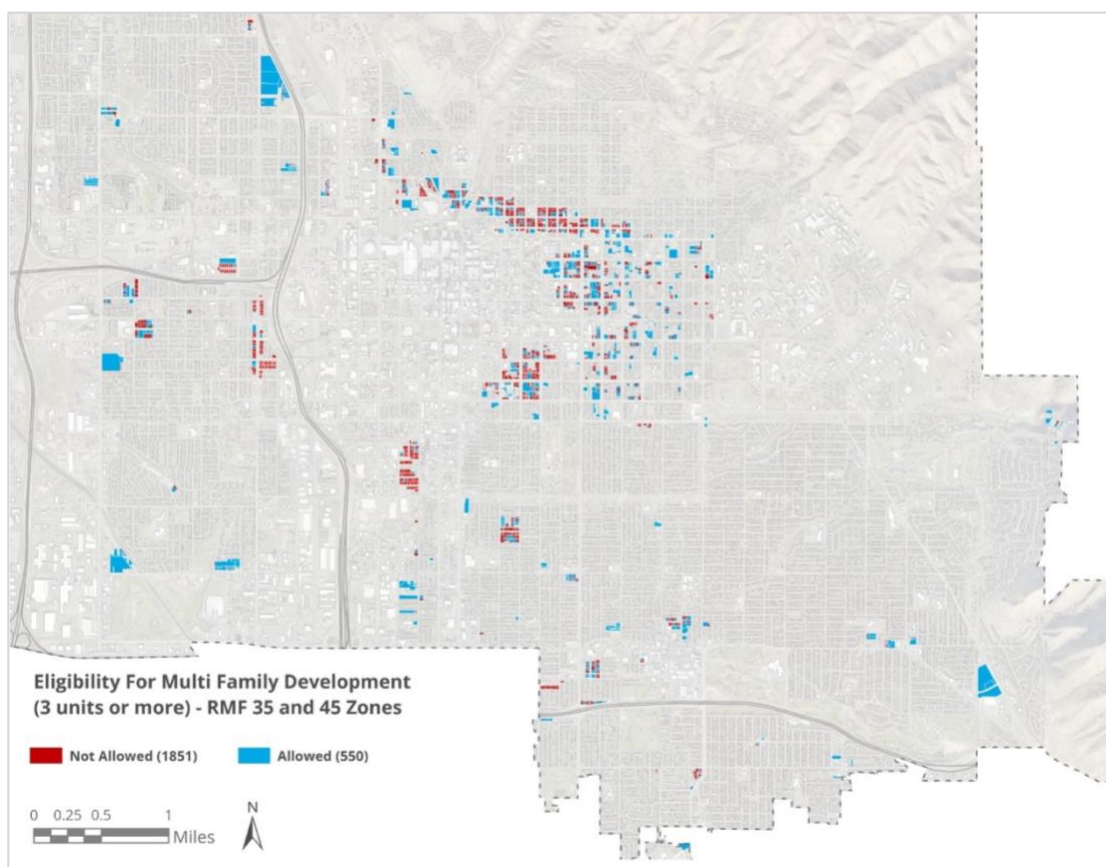


² Roughly 3,832, or approximately 60% of the parcels within the RMF35 and RMF 45 Districts, are “unit parcels” associated with individual condominium units rather than actual lots. These parcels were removed from the dataset for this evaluation

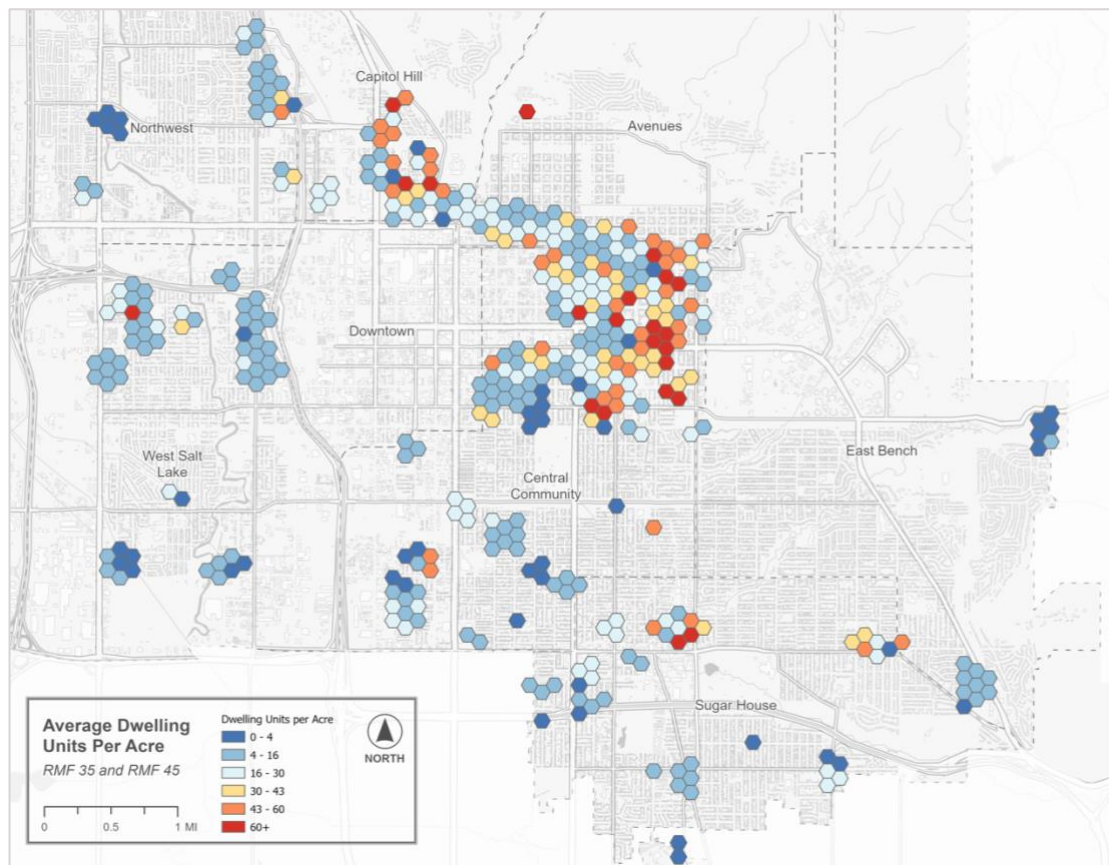
DENSITY

The purpose statements for both the RMF-35 and RMF-45 districts establish their intended maximum densities. The RMF-35 district is meant for areas where adopted plans recommend a density of 30 or fewer dwelling units per acre, while the RMF-45 district is for areas recommending 43 or fewer dwelling units per acre. While the stated intent of these two districts is to promote medium-density multi-family, only 10% of properties in the RMF-35 and RMF-45 districts are associated with developments of this type compared to the 34% of lots. **An analysis of the average dwelling units per acre within the two districts (on the next page) found that most of the area within the two districts often falls far below their intended density thresholds.**

Residential density within the city is primarily regulated by a district's minimum lot size per unit. In both districts, properties must be larger than 9,000 square feet to qualify for multi-family development (see the lot area analysis for a more detailed explanation). **Within the two districts, only 550 lots (roughly 25%) meet this 9,000-square-foot threshold, meaning that only a quarter of all properties in these districts qualify for multi-family development.** As they are designed now, neither districts does enough little to encourage the moderate density they are intended to provide.



The discrepancy between the desired density and actual development within these districts creates an environment where a developer may have to combine multiple properties on a block to meet minimum lot width and area requirements for a project that could produce enough units to be profitable. **Leaving the density requirements for both districts as-is will likely exacerbate housing affordability and livability issues within the city.**



NONCOMPLYING LOTS AND NONCONFORMING USES

Salt Lake City considers properties not meeting a dimensional requirement (like setbacks, minimum lot area, or building coverage on a lot) to be 'legal-noncomplying.' An existing use that would be prohibited within its property's zoning district (often having been established before currently applicable rules were adopted) is considered a 'legal nonconforming use.'

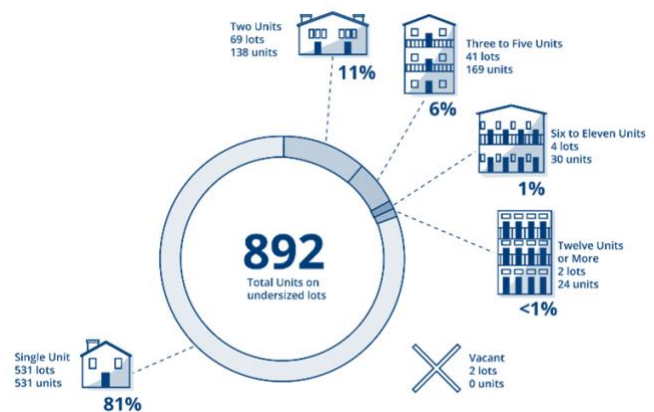
Both legally noncomplying lots and nonconforming uses are situated within the RMF-35 and RMF-45 zoning districts.

NONCOMPLYING LOTS

Many lots in the RMF-35 and RMF-45 zoning districts do not conform with the district's dimensional or density requirements, most established before the 1995 changes.

There are buildings much taller than the permitted height (like the condominiums on Donner Way and Kennedy Drive near the mouth of Emigration Canyon), buildings with more units than permitted by the area of their lot (like many apartments within the southern part of the Avenues Neighborhood), and lots much smaller than the district's minimum required area of 5,000 square feet (which includes many properties within the City's historic districts).

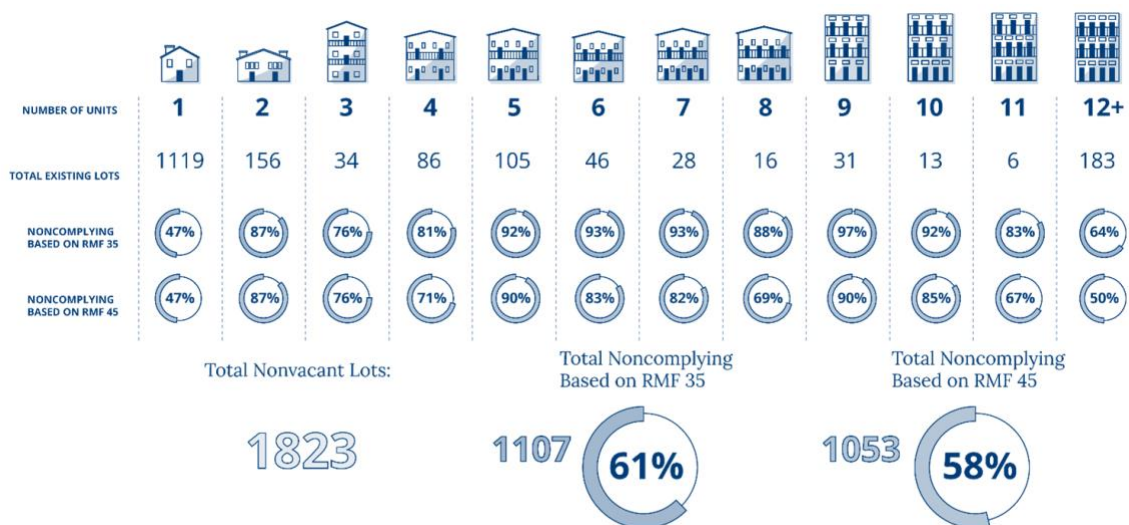
What Exists on Undersized Lots Today? (lots under 5,000 sq ft)



Properties with buildings larger than the intended scale of either district (like the above-mentioned condominium towers near Emigration Canyon) should be rezoned to a more appropriately scaled district (like the RMF-75 High-Density Multi-Family Residential District). However, when issues are more common, like lot size, density, and setbacks, zoning regulations should be adjusted to better accommodate the existing built environment.

Planning staff visited multiple parts of the City within the RMF-35 and RMF-45 districts and found numerous examples of properties that were too small, too dense, too close to the street, under-parked—or any combination of everything listed—according to existing regulations.

Noncomplying Lots by Number of Units



NONCONFORMING USES

Nonconforming uses are less common within the two districts but still present. Common nonconforming uses include a handful of offices, retail establishments, restaurants, medical offices, and (in a few cases) outdoor storage yards. **Other than a few tweaks, staff does not see a need for significant changes to permitted land uses within these districts.** Both districts currently only permit residential uses with some minor exceptions (usually intended to serve or function as an accessory to those residential uses), which aligns with the intent established by their respective purpose statements.

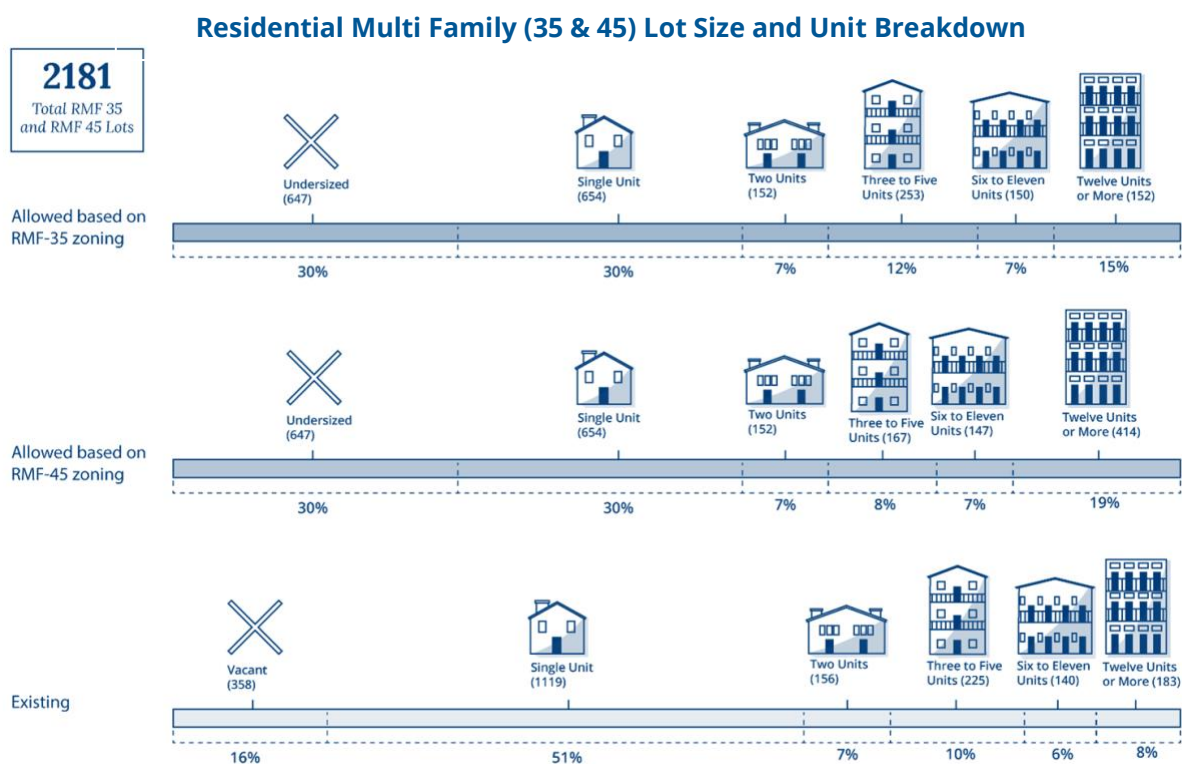


Barriers to New Development

LOT DIMENSION REQUIREMENTS

Many zoning districts, including RMF-35 and RMF-45, require minimum lot area and width. Determining the average lot width and area of existing parcels in both districts clearly shows their effectiveness and development potential, pointing to potential new standards.

Currently, the minimum lot area and width requirements are stricter for smaller lots (under 9,000 sq ft) in both the RMF-35 and RMF-45 districts. In both districts, the minimum lot area for a single-family dwelling is 5,000 sq ft, and the minimum width is 50 ft. As they exist today, 66% of the lots within the two districts do not meet the minimum width requirement to develop a detached single-family house, and 47% do not meet the minimum area requirement. Roughly another 26% fall within 5,000 sq ft and 8,000 sq ft, making them appropriate for only single-family development. To build more multi-family developments in these districts, developers would likely need to go through additional planning processes to consolidate existing lots to meet minimum lot size requirements or rezone them to a district with less strict requirements.



To effectively promote infill development in these districts, the RMF-35 and RMF-45 may need more flexible minimum lot area requirements. This could include adjusting minimum lot requirements to reflect existing conditions or to a level that qualifies as moderate density.

MINIMUM LOT WIDTH

The minimum lot width required for new multi-family buildings (three dwelling units or more) is 80 ft in both districts. An analysis of lots within the two districts found that 83% of properties did not meet that threshold. Duplexes can be built on lots wider than 50 feet, but only single-family buildings are permitted on anything narrower.

Average Width	56 ft.
% below 50 ft.	62.6%
% below 80 ft.	82.74%

The average lot width for existing properties within the two districts is 56 feet ³, showing a disconnect between the requirements for new development and the potential of existing lots.

Most of the largest lots contain multi-family buildings, the largest being the “Ashford Apartments” (625 S Redwood Rd), a 14-building apartment complex with a lot width of 635 feet. Many of the developed small lots contain single-family homes and are around 24 feet in width. One example is Bliss Court (roughly 300 N 550 w), a 41-unit townhome development with individual lots on a private road.

Given the current lot width requirements, infill development (building on empty or underused land within established areas) within these districts remains unlikely. **If the minimum lot widths for either district are not adjusted, development within them will continue to reflect the large-scale projects listed above, likely displacing existing single-family housing in the long term.**

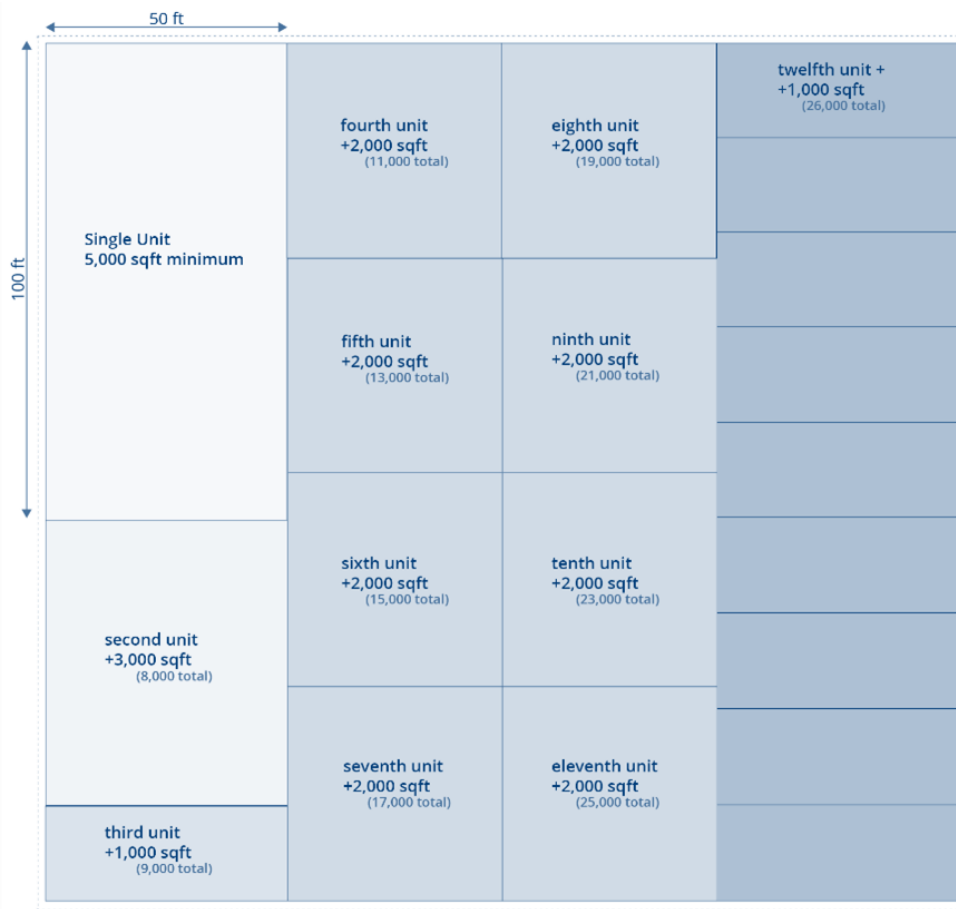
³ Roughly 3,832, or approximately 60% of the parcels within the RMF35 and RMF 45 Districts, are “unit parcels” associated with individual condominium units rather than actual lots. These parcels were removed from the dataset for this evaluation.

MINIMUM LOT AREA

The minimum lot area required for new development in the RMF-35 and RMF-45 districts varies according to the type of development. Generally, detached single-family homes require 5,000 sq ft per home; a multi-family development with 3-11 family dwellings requires 9,000 sq ft, and a multi-family development with more than 11 units requires 12,000 sq ft. Lots smaller than 5,000 square feet are allowed to follow the requirements for the R-1/5,000 Single Family Residential Zoning District. Interestingly, duplexes are not permitted in the RMF-45 zoning district.

The average lot area in the RMF-35 district is approximately 7,957 sq ft, and in the RMF-45 district, it's 13,488 sq ft. This means the average lot within the RMF-35 district does not meet the minimum area requirements to build multi-family housing. **Although the average lot area is higher in the RMF-45 district, the average lot still does not have the required lot area to build more than 14 multi-family units**, which is significantly less than the maximum density outlined as appropriate in the district's purpose statement.

**RMF-35 Minimum Lot Size
by Number of Units**

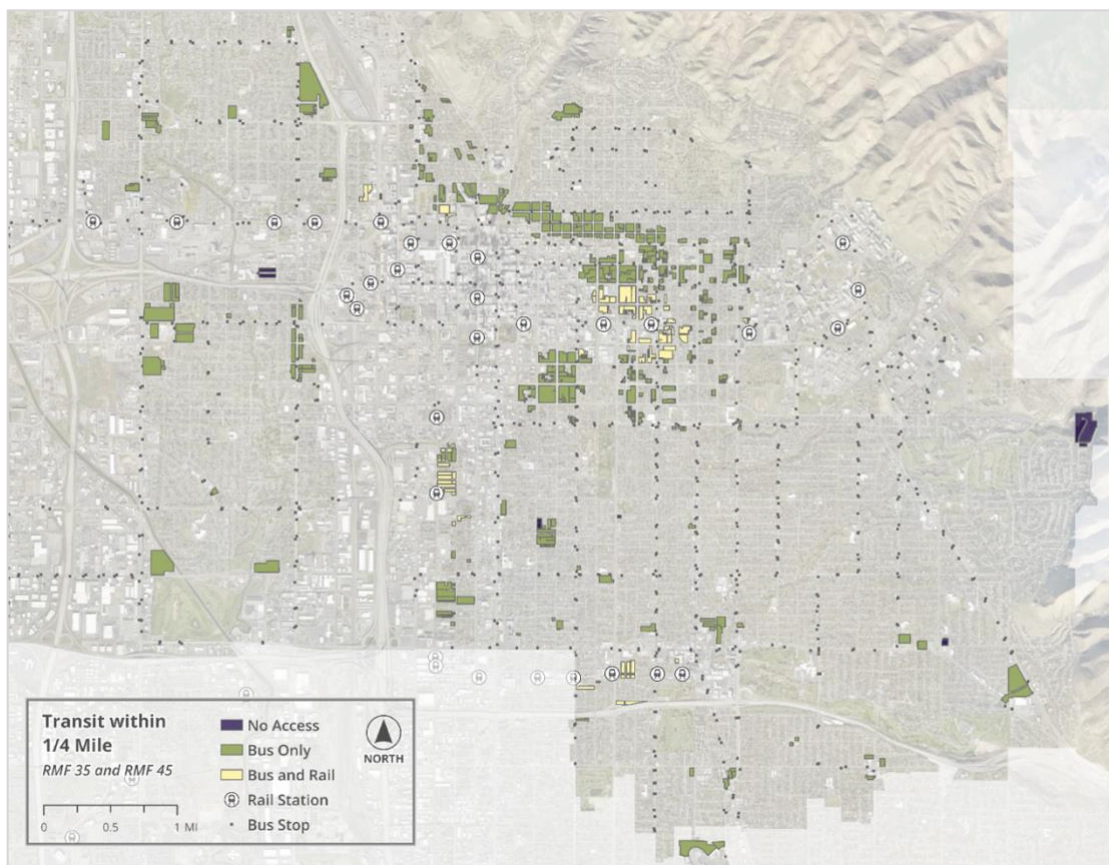


<div> <div>50 ft</div> <div>100 ft</div> </div> <div> <div>Single Unit</div> <div>5,000 sqft minimum</div> </div>	<div>fourth unit</div> <div>+1,000 sqft</div> <div>(10,000 total)</div>	<div>thirteenth unit</div> <div>+1,000 sqft</div> <div>(19,000 total)</div>
	<div>fifth unit</div> <div>+1,000 sqft</div> <div>(11,000 total)</div>	<div>fourteenth unit</div> <div>+1,000 sqft</div> <div>(20,000 total)</div>
	<div>sixth unit</div> <div>+1,000 sqft</div> <div>(12,000 total)</div>	<div>fifteenth unit</div> <div>+1,000 sqft</div> <div>(21,000 total)</div>
	<div>seventh unit</div> <div>+1,000 sqft</div> <div>(13,000 total)</div>	<div>sixteenth unit+</div> <div>+800 sqft</div> <div>(21,800 total)</div>
	<div>eighth unit</div> <div>+1,000 sqft</div> <div>(14,000 total)</div>	
<div> <div>X</div> <div>(two units not permitted)</div> </div> <div> <div>third unit</div> <div>+4,000 sqft</div> <div>(9,000 total)</div> </div>	<div>ninth unit</div> <div>+1,000 sqft</div> <div>(15,000 total)</div>	
	<div>tenth unit</div> <div>+1,000 sqft</div> <div>(16,000 total)</div>	
	<div>eleventh unit</div> <div>+1,000 sqft</div> <div>(17,000 total)</div>	
	<div>twelfth unit</div> <div>+1,000 sqft</div> <div>(18,000 total)</div>	

PARKING REQUIREMENTS

While the RMF-35 and RMF-45 districts are geographically ideal for incorporating transit-oriented development, they have minimum parking requirements that do not reflect their proximity to transit and amenities. Plan SLC sets forth an ambitious goal of having every household in Salt Lake City within 1/4 mile of public transit service by 2040. Roughly 96% of lots within the RMF-35 and RMF-45 districts have access to public transit within 1/4 mile, and almost 20% have both bus and rail options within this distance.

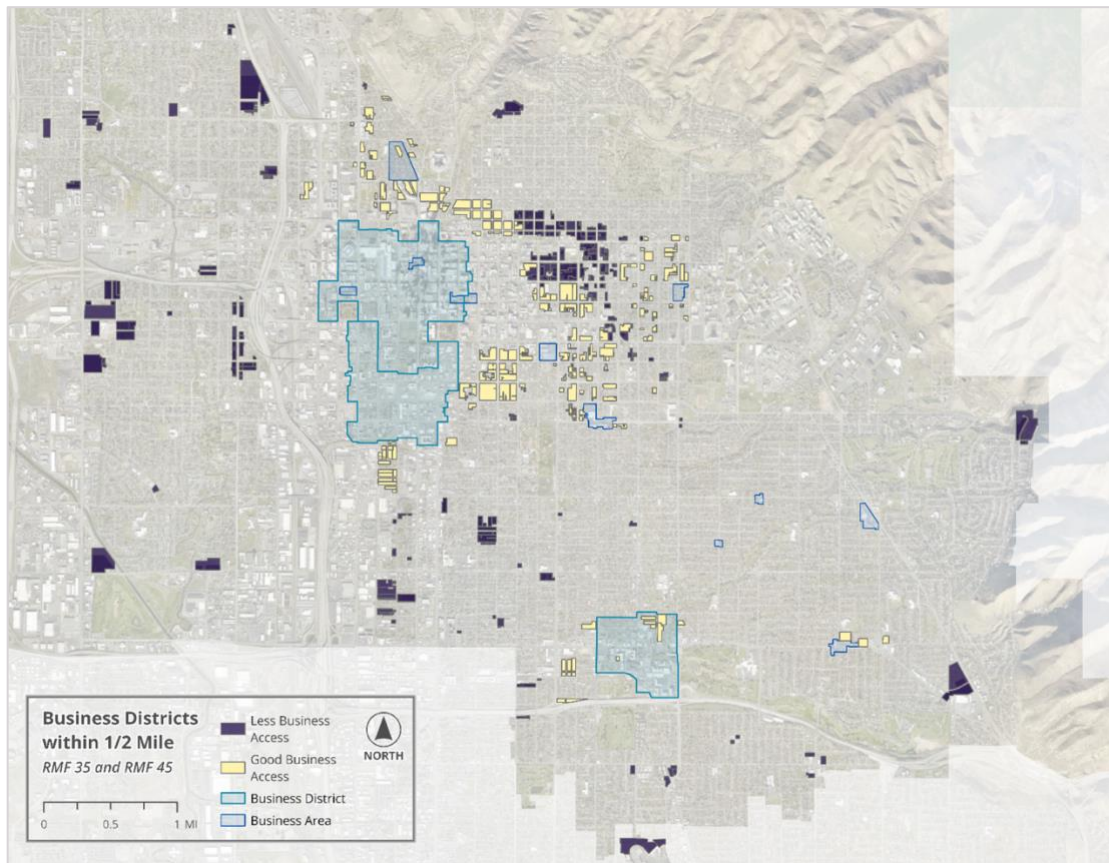
Additionally, 56% of these parcels are within half a mile of business areas or business districts, meaning they have a high potential for residents to walk to reach daily needs, employment, recreation, and retail destinations.



Despite the well-resourced locations of RMF-35 and RMF-45 parcels, these districts fall within the 'General Context' category for minimum and maximum off-street parking requirements. This means they must provide more off-street parking than districts within the neighborhood center, urban center, and transit contexts.

New multi-family housing in the RMF-35 and RMF-45 districts must provide a minimum of 1 space for every studio and one-bedroom unit, and a minimum of 1.25 spaces for every unit with two or more bedrooms. This starkly contrasts with the 'Transit Context,' where new multi-family development has no minimum off-street parking requirements.

Because minimum parking mandates can drive up housing costs and decrease the number of housing units a developer can provide when they need to dedicate more parking, it is essential to assess the appropriate number of necessary off-street spaces. **Given the excellent proximity to transit and business centers, it is likely that many residents who choose to live in RMF-35 and RMF-45 districts may choose not to own a car and rely instead on public transit and active transportation.** The parking requirements in these districts need to be re-evaluated to avoid higher housing costs for these residents due to parking they will not use.





Existing Plans & Policy Direction

NEIGHBORHOOD PLANS (FLUS)

Each neighborhood plan that provides direction on housing goals and plans includes language that supports a moderate-density residential zoning district in specific areas of the city. Below are excerpts pulled from each plan. For some older plans like Avenues and Capitol Hill, a summary has been provided that details the overall message concerning moderate density development within those plans.

AVENUES GENERAL PLAN

This plan was adopted in 1987, which is older than the existing zoning code adopted in 1995. **Therefore, many of the recommendations, strategies, and goals do not have direct parallels to the zoning code as it exists today. However, the future land use map does identify areas where housing densities of 20 units per acre are acceptable. These are the areas that are currently RMF-35 and RMF-45.**

Additionally, there are several planning goals that relate to this project. The planning goal for Land Use reads in part, “Preserve the residential character and existing land use patterns in the Avenues Community.” As a relatively intact historic neighborhood with a mix of existing housing types, a moderate-density residential zoning district should help preserve what is here while allowing for infill development that blends with the existing streetscape where feasible.

CAPITOL HILL GENERAL PLAN

The first goal of the plan reads, “encourage appropriate housing opportunities in the community in appropriate locations through renovation of existing structures and compatible infill development and redevelopment.” Most of this area is built out and protected by historic districts. **The future land use map identifies areas where medium density housing already exists and provides opportunities for compatible residential infill development.**

CENTRAL COMMUNITY GENERAL PLAN

Part of the Vision for Livable Communities and Neighborhoods:

“The appropriate transition of multi-family housing with mixed land uses in designated areas supports sustainable development within the community.”

Describing the East Downtown Neighborhood:

“Because of its proximity to Downtown, its less expensive land and its attractive setting with landscaped park strips and wide tree-lined streets, the area has been under pressure to change from its original medium and high density residential character to commercial/office use. Some of the older original apartment buildings and most of the single-family residential units have been replaced with commercial office structures. The accelerated rate of erosion and demolition of housing units threatens the residential viability and character of the area.”

Describing the Central City Neighborhood:

“Provide more three and four bedroom housing units.”

“Encourage the expansion of the housing stock in ways that are compatible with the historic character of the neighborhood.”

One of the Residential Land Use Policies Guiding the General Plan:

“Provide opportunities for medium-density housing in areas between the Central Business District and lower-density neighborhoods and in areas where small multi-family dwellings are compatible.”

DOWNTOWN GENERAL PLAN

A Housing Choice Target to Reach:

“an increase in the number of small scale housing types, including small lot homes, townhouses, and other urban oriented housing types.”

Initiatives Guiding Multiple Districts Within the Plan:

“Use development regulations and modify density requirements to promote housing in a mix of housing types to appeal to a broad market, promote diversity and make downtown living accessible to a wide variety of people.”

“Utilize interior streets and walkways for smaller scale building, like townhouse development, to activate interior of blocks while keeping main streets commercial.”

“Encourage the development of or create incentives for housing for families with children, as part of identifiable neighborhood areas, in ground-oriented or low-rise dense developments.”

EAST BENCH GENERAL PLAN

Describing an initiative to increase housing options in established neighborhoods:

“There are a number of existing multi-family properties that are located in single-family residential zoning districts, thereby making the properties nonconforming from a zoning perspective. A nonconforming use status places restrictions on properties that prohibit reconstruction, expansion, and places limits on improvements that can be made before the housing units are lost. Rezoning existing multi-family properties to an appropriate zoning designation that permits the existing number of dwelling units would remove the nonconforming status of the property and allow greater flexibility in making improvements to the property.”

Future planning efforts for Foothill Drive:

“The Foothill Drive corridor should accommodate future growth with mixed-use development focused at the existing commercial and multifamily nodes and low to medium residential in between those nodes.”

NORTH TEMPLE BOULEVARD PLAN

Characteristics of a transition area between nodes:

“A mix of housing types, ranging from 3-4 story multifamily developments to single-family homes.”

SUGARHOUSE GENERAL PLAN

Policy for medium density residential development:

“Encourage new Medium-Density housing opportunities in appropriate locations in Sugar House. Encourage a variety of densities in the Medium-Density range while ensuring the design of these projects is compatible with surrounding residential structures.”

Policy for medium-high density residential development:

“Support opportunities for conversion and infill development of Medium-High Density housing while requiring appropriate design and location to minimize land use conflicts with existing single family development.”

Residential implementation strategies:

“Evaluate the zoning ordinance to identify any impediments to providing new housing options within the community.”

“Evaluate the zoning ordinance for any impediments to developing a variety of housing types and propose amendments as necessary.”

WESTSIDE GENERAL PLAN

Describing community nodes:

“While some existing community nodes do not have residential components, new developments at these locations should incorporate housing. These nodes provide good opportunities to add density with multi-family residential units. Densities should be on the order of 20 to 30 dwelling units per acre with appropriate building forms to complement adjacent lower density uses if necessary.”

Implementation strategy for community nodes:

“Allow property owners at the identified community nodes to take full advantage of their properties to add density and commercial intensity to the area. A certain percentage of residential development should be required for developments over a certain size and the density benchmarks should be between 25 to 50 dwelling units per acre. Developers should be encouraged to aim for three to four stories in height, provided appropriate buffering and landscaping can make the new development compatible with any surrounding single-family development.”

PLAN SALT LAKE

Plan Salt Lake, the city's comprehensive plan, provides clear direction on how the RMF-35 and RMF-45 zoning districts should function, particularly regarding infill and "missing middle" housing—housing types that bridge the gap between single-family homes and large apartment buildings or commercial nodes. Specifically, several policies in the plan collectively encourage the recommendations listed in this report.

A few examples are listed below:

- 1. Promoting Efficient Growth:** The plan highlights the importance of density and compact development as crucial elements of sustainable growth. By encouraging more units within areas with existing infrastructure, the plan supports moderately dense housing—a balanced option for development between single-family homes and large apartment complexes.
- 2. Diverse Housing Options:** The plan advocates for neighborhoods with a diverse mix of uses and housing types. As they are currently written, the RMF-35 and RMF-45 zoning districts do not achieve this diversity, placing barriers to a range of residential choices that could cater to different needs and preferences within the same community.

- 3. Maintaining Neighborhood Character:** The plan emphasizes preserving neighborhood stability while accommodating growth. By allowing flexibility for infill on a site instead of clearing it, this report's recommendations would support new housing opportunities in a way that avoids compromising neighborhood character.
- 4. Enhancing Connectivity:** The plan calls for well-connected neighborhoods with various transportation options. This report's recommendations are meant to encourage "missing middle" housing, typically within walkable, transit-accessible areas.

Plan Salt Lake's "Guiding Principles:" strongly support revising the RMF-35 and RMF-45 zoning districts to encourage more infill and "missing middle" housing. This approach aligns with the city's vision for sustainable growth, ensures neighborhood stability, and offers diverse, accessible housing options for all residents.

THRIVING IN PLACE

Salt Lake City's anti-displacement plan, [Thriving in Place \(2023\)](#), aims to protect residents from displacement, especially those associated with the city's most at-risk communities. The plan sets out clear goals to help guide the City's policy decisions, mainly focusing on reducing the adverse effects of development on marginalized and vulnerable groups.

GOALS OF THRIVING IN PLACE

- 1. Protect tenants from being displaced, especially those who are most vulnerable.*
- 2. Preserve the affordable housing that currently exists.*
- 3. Build more housing, with a focus on affordable options.*
- 4. Increase funding for tenant support and affordable housing.*
- 5. Work together with partners to make a bigger impact.*
- 6. Advocate for tenant rights at the state level.*

These goals are designed to ensure that, as the city develops, everyone has a chance to benefit and that no one is left behind. Strategy 3C of the plan is particularly relevant to the RMF-35 and RMF-45 zoning districts. This strategy emphasizes the need for more "missing middle" housing. This type of housing offers more units than single-family homes but is not as dense as large apartment complexes. It is a way to provide affordable options for middle-income families without drastically changing a neighborhood.

As they are currently written, the RMF-35 and RMF-45 zoning districts do not encourage the development of more "missing middle" housing. The issues discussed in this report (including minimum lot width, minimum lot area, setbacks, etc.) can limit moderate-density infill.

Instead, due to their complex minimum lot size requirements, the two districts often encourage developers to consolidate multiple lots for large apartment complexes, like Foothill Village or the Gladhouse townhome-style development recently completed at 1034 W 1700 S.

Limiting opportunities for “missing middle” infill development can lead to situations where important commercial spaces, like grocery stores, are replaced by housing developments. For example, in the Glendale neighborhood, a grocery store that was zoned for both commercial and multi-family use (in the CB Community Business District) was recently closed to be replaced by townhouses. To address the possible displacement of both residents and commercial spaces, the RMF-35 and RMF-45 zoning districts should be modified to encourage more moderate-scale (“missing middle”) infill.

WATER USE

Water use is an essential consideration when planning cities within arid regions like the Interior West. ["Integrating Water Efficiency into Land Use Planning in the Interior West: A Guidebook for Local Planners"](#) (Blanchard, 2019) has helped guide local governments create land use policies that use water resources efficiently.

The guidebook lists multiple strategies that can help save water, and many can assist in refining the RMF 35 & RMF-45 zoning districts, including:

- *Increasing the number of units per acre,*
- *Developing clusters of houses or reducing lot sizes,*
- *Encouraging the use of existing spaces within cities (infill development),*
- *Reducing the space required between buildings and the street (setback requirements).*

Research by Sampson, Quay, and Horrie (2022) supports these ideas, showing that water use per person tends to decrease when more units are built closer together. Additionally, Heidari and colleagues (2021) point out that infill development not only supports older urban areas but also uses existing infrastructure, reducing the need for costly new utilities. Research from Arizona State University found that factors like landscaped area, unit density, building age, and lot size all influence water use in cities like Portland, Oregon; Austin, Texas; and Salt Lake City, Utah (Stoker et al., 2019).

Further research by the EPA has highlighted the benefits of higher-density development for protecting water resources (Office of Sustainable Communities, 2006). Their study found that areas with higher housing density generally produce less stormwater runoff and have fewer hard surfaces that prevent water from soaking into the ground—which is good for the watershed.

Looking at specific examples, a study in Denver found that single-family homes on larger lots use much more water than smaller homes (Sampson et al., 2022). Similarly, a study in Fort Collins, Colorado, showed that sprawling developments use more water, mainly because of activities like lawn watering (Heidari et al., 2021). On the other hand, higher-density developments help save water and make it easier for cities to handle water shortages.

These studies highlight how the recommended changes to the RMF-35 and RMF-45 zoning districts may impact Salt Lake City's water infrastructure positively. Encouraging moderate-density development, when appropriate, aligns well with water conservation practices in urban areas.

HISTORIC STRUCTURES AND ADAPTIVE REUSE

Salt Lake City has 14 local historic districts governed by the Historic Preservation Overlay regulations. Many properties in the RMF-35 and RMF-45 zoning districts fall within these historic districts. Out of all the local historic districts, the South Temple Local Historic District has the highest concentration of properties in RMF-35 or RMF-45. **In addition to applicable zoning regulations, new development within the South Temple Local Historic District would need to meet additional preservation standards and applicable design guidelines.**

Existing historic multi-family properties within the RMF-35 and RMF-45 districts should be preserved. Demolishing a building in a historic district requires approval from the Historic Landmark Commission after meeting overlay requirements. New developments within these historic districts must comply with guidelines for new construction. While some may argue that these standards hinder the development of vacant properties into multi-family buildings, it is important to note that most properties in these districts are already developed. Therefore, **these standards ensure that any new developments align with the historical character and context of the neighborhood, resulting in a higher-quality outcome.**

Adaptive reuse, or the process of adapting historic structures for modern uses, presents several challenges. Property owners and developers often face significant hurdles, like the cost and complexity of retrofitting old buildings to meet current codes. **Addressing these obstacles might involve offering financial incentives, technical assistance, or flexible guidelines that still respect the integrity of historic buildings.**

Recently, the City Council passed incentives for the adaptive reuse of older buildings. They illustrate how Salt Lake City has worked to encourage both growth and historic preservation. For example, these incentives remove the minimum lot size requirement per dwelling unit if an existing building is preserved. In addition to those incentives, the RMF-30

zoning district offers a one- or two-unit density bonus for preserving existing structures, further helping to preserve the existing scale and character of a neighborhood while increasing housing stock. These strategies—providing density bonuses and easing lot and bulk requirements—may help to meet new housing demand while preserving the city's historical character. Similar policy approaches should be considered when updating the RMF-35 and RMF-45 requirements.

As the city grows and the pressure to develop new housing increases, it is important to remember the impact on these historic districts—balancing the demand for more housing with the city's historic fabric. **By applying some of the successful tactics listed above, it may be possible to walk the line and promote quality infill development within local historic districts.**

TRANSPORTATION GENERAL PLAN

Salt Lake City's recently adopted transportation plan, [Connect SLC \(2024\)](#), sets out a vision and goals to guide the future of transportation in the City. It focuses on making Salt Lake's transportation systems more equitable, affordable, and sustainable and on meeting the climate goals outlined in the SLC Climate Positive 2040 Resolution.

GOALS OF CONNECT SLC

1. *Focus on housing affordability.*
2. *Bring people closer to destinations.*
3. *Connect people to transit.*
4. *Promote active transportation.*
5. *Expand transit options.*
6. *Promote connectivity at the block level to create walkable districts.*

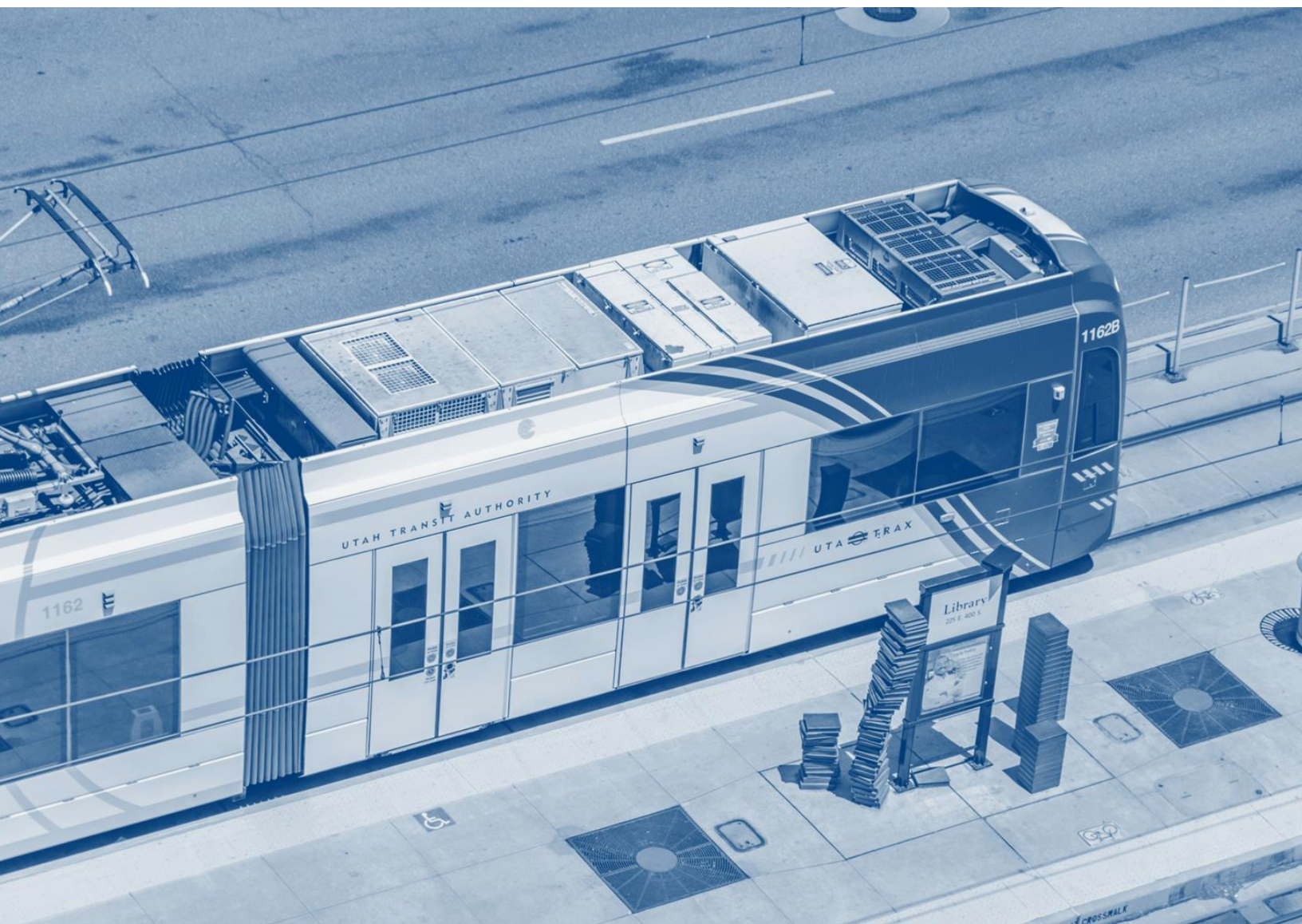
As land use decisions are inextricably tied to transportation options, the RMF-35 and RMF-45 zoning districts are particularly well-suited to play a crucial role in meeting these transportation goals. One of the greatest advantages of building mid-density multi-family housing is that this type of development creates more walkable and sustainable communities by locating more households near amenities and transit facilities.

Affordability is one of the City's top priorities in transportation and housing development. On average, housing and transportation costs account for 39% of household spending (pg. 48), and the cost of transportation increases as residents live farther away from the central area of SLC. Low-income individuals and families typically cannot afford to live near their workplaces and have longer commutes. **For people who are unhoused or living in severe poverty, the costs of car ownership or transit passes can be an obstacle to meeting daily needs.**

The RMF-35 and RMF-45 districts can help close the gap in high housing prices and proximity to jobs, as mid-density multi-family units tend to be more affordable than single-family homes or high-rise apartments and are a good fit for households of various income levels. While the RMF-35 and RMF-45 zoning districts are intended to promote multi-family development, the current strict requirements on lot sizes and widths in relation to the number of units allowed have severely restricted housing density and active transportation potential.

Revising standards for RMF-35 and RMF-45 districts will go a long way in incentivizing affordable housing development and bringing people closer to their destinations.

Effective transportation and land use policy is a powerful tool in addressing affordability by bringing residents closer to essential services, healthy food options, and jobs to meet their daily needs.



Conclusion

The analyses and discussions in this report establish that neither the RMF-35 Moderate Density Residential Multi-Family District nor the RMF-45 Moderate/High-Density Residential Multi-Family District has effectively fulfilled its stated intent to provide moderate- and moderate/high-density housing. **Staff has found that both districts are much too restrictive; the data proves this. Currently, most properties within the two districts exceed established density regulations (61% of RMF-35 and 58% of RMF-45).**

Most (66%) do not meet required lot minimums for new development. Since their inception in 1995, only a tiny percentage (4%) of properties within the two districts have been developed. It is also apparent that neither district's standards align with many of the adopted goals and policies in the City's general and neighborhood plans.

While roughly 96% of lots within the RMF-35 and RMF-45 districts are within a quarter-mile of transit, parking minimums require more than one space per new family-sized unit (2 or more bedrooms). **Instead of the "missing middle" and infill housing that plans like [Thriving in Place \(2023\)](#) are calling for, development has generally been large-scale and separated from neighborhoods.**

Based on these takeaways, Planning staff has provided some preliminary recommendations to guide the development of a more effective moderate/high-density zoning district. Any development of new regulations should follow these recommendations. In addition to a robust public process that works with stakeholders and affected community members, Planning staff is confident that these recommendations can effectively guide the development of better regulations that achieve the City's goals while supporting current and future residents.



Additional Materials

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RMF-35 & RMF-45 MINIMUM LOT REQUIREMENTS

Land Use	RMF-35		RMF-45	
	Minimum Area	Minimum Width	Minimum Area	Minimum Width
Multi-Family Dwellings (3 - 11 Units)	9,000 sq ft (+2,000 sq f for every unit over 3)	80 ft	-	-
Multi-Family Dwellings (3 - 14 Units)	-	-	9,000 sq ft	80 ft
Multi-Family Dwellings (12+ Units)	26,000 sq ft	80 ft	-	-

Land Use	RMF-35		RMF-45	
	Minimum Area	Minimum Width	Minimum Area	Minimum Width
Multi-Family Dwellings (15+ Units)	-	-	21,000 sq ft	80 ft
Municipal Service Uses (Including City Utility Uses, Police & Fire Stations)	No minimum	No minimum	No minimum	No minimum
Natural Open Space and Conservation Areas (Public & Private)	No minimum	No minimum	No minimum	No minimum
Places Of Worship (Under 4 Acres in Size)	12,000 sq ft	140 ft	12,000 sq ft	140 ft
Public Pedestrian Pathways, Trails & Greenways	No minimum	No minimum	No minimum	No minimum
Public/Private Utility Transmission Wires, Lines, Pipes & Poles	No minimum	No minimum	No minimum	No minimum
Single-Family Attached Dwellings	3,000 sq ft per unit	Interior: 22 ft Corner: 32 ft	3,000 sq ft per unit	Interior: 22 ft Corner: 32 ft
Single-Family Detached Dwellings	5,000 sq ft	50 ft	5,000 sq ft	50 ft
Twin Home Dwellings	4,000 sq ft per unit	25 ft	-	-
Two-Family Dwellings	8,000 sq ft	50 ft	-	-
Utility Substations and Buildings	5,000 sq ft	50 ft	5,000 sq ft	50 ft
Other Permitted or Conditional Uses (As Listed in Section 21a.33.020 of this Title)	5,000 sq ft	50 ft	10,000 sq ft	80 ft

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