



MEMORANDUM

PLANNING DIVISION
DEPARTMENT of COMMUNITY and NEIGHBORHOODS

To: City Council Members
From: Nannette Larsen, Senior Planner
Date: January 12th, 2023
Re: Landscaping & Buffers Chapter

During the briefing held on December 12, 2023, the City Council provided guidance and direction for changes to the 21A.48 Landscaping & Buffers Chapter draft. The following memorandum is a response to the comments and requested changes:

1. Parking Lot Landscaping

Applicability: The Council discussed concerns with the proposed minimum number of stalls before parking lot landscaping standards would apply. Specifically, that the proposed threshold for when parking lot landscaping applies may limit infill development or redevelopment potential of smaller properties.

In the initial proposal presented to Council, parking lot landscaping would apply to parking lots with 10 or more parking stalls. Currently, parking lot landscaping is required for parking lots with 15 or more parking stalls.

Parking lot landscaping requirements include interior and perimeter landscaping. A minimum of 5% of the square footage of the parking lot is required for interior parking lot landscaping. Interior landscaping areas must be provided on parking row ends, and every 6 parking spaces or between double-loading parking rows. Perimeter parking lot landscaping is required where a parking lot is located within a required yard area or within 20' of a property line. The recommended width of the perimeter parking lot landscaping is 8'.

Analysis: For the Council's consideration, analysis of the percentage of parking lot landscaping that would be required for a parking lot with 10 stalls (initial proposal), 15 stalls (current code requirement) and 25 stalls, is provided below.

The following calculations are based on the assumption that the average parking lot size is approximately 350 square feet per parking stall.

Parking Lot	Parking Lot Square Footage	Minimum Interior Landscaping 5%	Perimeter Landscaping 8'	Total Landscaping as a % of a Parking Lot
10 Stalls	3,500	175 Sq Ft	944 Sq Ft	31%
15 Stalls	5,250	262 Sq Ft	1,144 Sq Ft	26%

(Current requirement & recommendation)				
25 Stalls	8,750	437 Sq Ft	1,488 Sq Ft	22%

It is recommended that the threshold for when parking lot landscaping applies is maintained at 15 stalls, the current ordinance requirement. A parking lot with 15 stalls would require approximately 26% landscaping with a typical design. This total landscaping area of 28% is similar to vegetation coverage standards, of 1/3rd, in required yard areas.

Recommendation: maintain the parking lot landscaping threshold at 15 stalls

Status: direction needed.

Perimeter Landscaping: The majority of parking lot landscaping falls within the perimeter landscaping, encompassing all of the required parking lot landscaping except generally the 5% interior landscaping area. The perimeter parking lot landscaping acts as both a tool that reduces the urban heat island as well as a form of a land use buffer from adjoining properties. Currently the parking lot perimeter landscaping width is required at 7', this was increased to a minimum of 10' in the initial proposal presented to council. The purpose of the initial proposal of 10' was to promote tree health and longevity, it was also increased to match landscape buffer widths required elsewhere in the chapter.

While there is some concern about the amount of required perimeter parking lot landscaping, it is still recommended that there is an increase in perimeter landscaping width to improve tree health in these areas. After follow-up conversations with the Urban Forester, 8' in width is sufficient to support tree health and reduce tree mortality rates. It is recommended that the perimeter parking lot landscaping be a minimum of 8' to assuage concerns regarding infill and redevelopment properties while still sufficiently addressing and mitigating the effects of a parking lot located within 20' of a property line and reducing the urban heat island effect.

Parking Lot	Parking Lot Square Footage	Perimeter Landscaping 8'	Perimeter Landscaping 10'	Perimeter Landscaping (8') as a % of Parking Lot	Perimeter Landscaping (10') as a % of Parking Lot
10 Stalls	3,500	944 Sq Ft	1,180 Sq Ft	33%	38%
15 Stalls	5,250	1,152 Sq Ft	1,440 Sq Ft	21%	32%
25 Stalls	8,750	1,488 Sq Ft	1,860 Sq Ft	17%	26%

The proposed landscaping chapter's perimeter and interior parking lot landscaping averages based on parking lot size are indicated in the above table. It is shown in this table that as parking lot square footages increases, the percentage of landscaping decreases. This is due to

most of the landscaping being located along the perimeter of the parking lot. While the overall landscaping to hard surface ratio decreases as the size of the parking lot increases, it is expected that the provision requiring a bioretention in parking lots with 50 or more stalls landscaping ratios will be similar to smaller square footage parking lots. This is because these bioretention areas will generally need to be larger, than the interior and perimeter parking lot landscaping minimums, to adequately detain stormwater in these larger parking lots.

Recommendation: require perimeter parking lot landscaping to be 8' wide

Status: direction needed

Clarification of Double-Loading Row and Row End Landscaping: The language in the most recent draft chapter was updated to clarify where interior parking lot landscaping is required. The type of interior landscaping locations provided are required to ensure dispersion of interior landscaping areas. The minimum 5% interior landscaping is stated to ensure sufficient interior parking lot landscaping is provided to meet the purpose and goals of the chapter.

Status: changes made to the legislative version, pg. 88, line 2642.

- “2. Location: Interior landscape areas shall be provided in the following locations:*
- a. At each end of a parking row containing 6 stalls or more, where not abutting required perimeter landscaping.*
 - b. Parallel to parking lot stalls, at a rate of 1 interior landscape area for every 6 parking spaces, or landscape areas may be provided along the interior length of double-loaded parking rows.”*

Accessibility: During the briefing there was a concern raised regarding the accessibility of parking lot and how the proposed parking lot landscaping standards would affect how pedestrians experience the increase in walking distance.

In addition to the 5% interior landscaping, it would also require 5' perimeter landscaping and a 3' walkway where a parking lot abuts the principal building. The interior parking lot landscaping area would affect the distance between parking stalls and access to the building. However, a 5% of interior landscaping area and a 5' perimeter landscaping area between the parking lot and the building, the increase in walking distance would be overall minimal.

In addition to the proposed changes to the Landscaping & Buffer chapter, are proposed modifications to the Off-Street Parking chapter (21A.44). Pedestrian walkways are proposed to be required where there are 25 or more stalls. One walkway, which is separate from drive aisles, is required for every 20 stalls provided. While the proposed parking lot landscaping will increase the distance from the surface parking lot to the building, the experience of the pedestrian will improve as there will be a separation between the pedestrian and vehicles, and there will be a reduction in the urban heat island.

Recommendation: no modification to proposed chapter

Status: direction needed

Reduce Required Minimum Interior Landscaping Size: The Council requested a change in the minimum required size of the interior parking lot landscaping areas to be similar to a standard parking stall. This modification would ease in the implementation of the ordinance and

encourage compliance. The original proposal required that interior parking lot landscaping areas be at least 10' wide and equal to the length of the adjoining stalls.

The Council recommended that the interior landscaping minimum width be reduced to the average parking stall width. The average stall width is dependent on the angle of the parking stall. Generally, standard parking stall widths are between 8' and 9'. The current interior landscaping minimum width is 5', it is recommended that this width is increased as this isn't sufficient space for tree health or a tree full canopy. The Urban Forester confirmed an interior parking lot landscaping area between 8' and 9' would be sufficient to promote the health and longevity of the tree. The draft Landscaping & Buffers chapter has been modified and now requires a minimum interior landscaping width equal average parking stall in the parking lot.

Status: changes made to the legislative version, pg. 88, line 2651.

“Size: Interior landscape areas shall have a minimum width equal to the width of average parking stall within the parking lot, as measured from the inside of the curbing, and shall have a minimum length equal to the length of the abutting parking spaces. Where interior landscape areas do not abut parking spaces, a minimum length of 10' is required.”

2. Why Allow Turf in Required Landscaping Areas:

The proposed Landscaping & Buffers chapter addresses high water consuming grass species which are commonly seen in single-family residential areas. These cool season grasses (like Kentucky Blue) are defined as turf in the proposed chapter. Turf is defined as: *“Grasses planted as a ground cover that may be mowed and maintained to be used as a lawn area of landscaping. Does not include decorative grasses, grasses that are adaptive or native to the local environment or grasses that do not generally require supplemental water, or inorganic substitutes commonly referred to as artificial turf.”* This definition of turf does not include all ground cover grass seed. The grass species which qualify as turf, those species which are non-adaptive and non-native to northern Utah climates, generally cool season grasses, are those grass species proposed to be limited in all zoning districts. Turf limitations are to reduce water consumption, qualify for waterwise rebates, and assist in changing landscape expectations in the City.

It is typical to see 100% turf coverage in residential districts as the preferred landscape material. While limiting turf in residential districts will still allow turf grasses that require more watering in the summer months to maintain a green lawn in 1/3 of the landscaping locations, it will cut high water consuming cool season grasses by over half, with a 2/3 reduction. It's important to remember that while many single- and two- family residential districts have landscaped rear yard areas, available for recreational activities, other residential districts do not always have this rear yard landscaping areas. An example of this is the RMF districts. In the RMF districts there are rear yard setbacks required but the rear yard is generally occupied by needed parking or storage areas to accommodate the increase in density. By allowing some turf in required yard areas it allows for multi-family residential districts to still provide a recreational or lounging space for residents in required landscaping areas, a landscaping use that is typical in residential neighborhoods.

Turf is proposed to be prohibited in manufacturing districts as it's rare for uses in manufacturing districts to utilize turf areas. All other zoning districts not included in the residential or manufacturing districts allow turf but only in active recreational areas. These

prohibitions and limitations also facilitate a reduction in water consumption while still allowing outdoor activity use, if these areas are dedicated to activities where turf is a typical playing surface. Turf limitations in these areas are needed to retain waterwise rebate eligibility for City residents.

Turf in park strips throughout Salt Lake City is proposed to be prohibited.

Recommendation: changes are not recommended

Status: direction needed

3. Public Information About Prohibiting Artificial Turf:

The concern was raised by Council regarding the public's response to prohibiting artificial turf in required landscaping locations. Public outreach is ongoing and staff will be updating the Landscaping & Buffers project webpage with information that is accessible to the public with accessible information on why it is recommended that artificial turf is prohibited as a landscaping material.

Status: outreach is ongoing

4. Reduction in Tree Canopy that Qualifies as Vegetation Coverage:

During the December briefing the Council was informed that the rewrite of the chapter includes the provision where a tree's canopy at maturity could count towards 100% of the vegetation coverage in required landscaping locations. At maturity, a small tree generally has a 300 square foot canopy, this would allow for a tree canopy to count toward 100% of the vegetation, resulting in the tree being the only living landscape material in these locations – the council expressed concern with this.

It's recommended that the qualifying tree canopy coverage is limited to the newly planted tree canopy at the time of planting or existing tree canopy. That way, it is the size of the canopy, not the age or degree of maturity that would be counted.

This would potentially still allow for existing mature trees to account for all the required vegetation, however, staff believes this still accomplishes the goals of the landscaping chapter and is in line with the goals of the urban forest action plan related to prioritizing trees. New trees would be calculated by their existing canopy, not their canopy at maturity, so it's likely that in the case of new trees, more than just a tree would be required to meet the vegetation requirements. Allowing existing tree canopies



Image 1: park strip trees with no vegetation ground cover

to qualify as vegetation coverage minimums would still incentivize trees in required landscaping locations, while still requiring sufficient organic material that benefits the appearance of neighborhoods, maintains soil health, and ensures sufficient evapotranspiration thereby assisting in the reduction of the urban heat island.

Recommendation: limit qualifying tree canopy coverage to existing canopies or canopies at the time of planting

Status: changes made to legislative version, pg. 84, line 2603.

“The total area of an existing tree canopy, or a tree canopy at the time of planting, may be included in the vegetation coverage calculations of the required landscaping location the tree is within.”

5. Rock Mulch Limits a Percentage of a Landscaping Area:

During the Council’s discussion the method of measuring and limiting rock mulch was raised as a possible issue where mulch beds are limited in size. It was recommended by Council that rock mulch is limited as a percentage of the landscaping area rather than a percentage of the mulch used.

The purpose of limiting rock mulch is to better address the effect rock mulch has on the urban heat island effect and soil quality. These goals can still be met when rock mulch is regulated as a maximum percentage of landscaping area.

The original proposed draft recommended that no more than 50% of the mulch used on the site may be rock mulch. This has been modified at the request of Council, to a maximum of 20% of rock mulch in the landscape area. The maximum rock mulch ratio was determined as rock mulch heat index and heat retention is similar to that of hard surfacing. However, rock mulch doesn’t have the same stormwater runoff rate that hard surfaces have.

This proposed maximum 20% rock mulch is also consistent with what was previously required – a maximum 50% of the mulch in the landscaping area. Landscaping areas must have no less than 33% of vegetation and has a maximum of 20% hard surfacing. The remaining landscaping area, 47%, could be mulched. Half of this allowed mulched areas would equate to approximately 20% of the required landscaping area.

Status: changes made to legislative version, pg. 92, line 2759

“f. Rock used as a mulch material is limited to 20% of an area where landscaping is required by this chapter.”

6. Increase Park Strip Vegetation Height Allowance:

The Planning Director brought up an issue that was raised over the summer about allowed vegetation height in the park strip. There was concern that some native plant species would be excluded from the park strip due to vegetation height restrictions. Allowed vegetation height in the park strip was previously proposed to remain at a maximum of 22”. The newly updated language to address this issue states that there cannot be a visual barrier between the sidewalk and the street – to ensure continued visibility between these spaces. The modifications also address view obstructions within the sight distance triangle.

Status: changes made to legislative version, pg. 81, line 2433

A. All landscaping shall:

- 1. Maintain a clearance from grade level to 7 feet above the sidewalk, or 10 feet above a street;*
- 2. Not create a hedge or visual barrier between the sidewalk and street;*
- 3. Not create obstructions within the sight distance triangle, as defined and illustrated in Chapter 21A.62 of this title;*

The full revised draft of the Landscaping & Buffers Chapter is attached for reference.