

June 28, 2021

**Via Electronic Mail**

Salt Lake City Planning Division  
451 S. State Street  
Salt Lake City, UT 84111  
Attn: Daniel Echeverria – Senior Planner

**Re:    *Written Narrative in Support of Master Plan and Zoning Amendment Applications***

Dear Daniel,

This firm represents PJJJ LLC (the “*Developer*”) in connection with a proposed multi-family residential real estate development in Salt Lake City. Developer owns a vacant lot located at 1902 S 400 E in Salt Lake City (the “*Property*”). Developer is proposing to develop the Property into an 8-Unit/Lot multi-family residential subdivision (the “*Project*”). The Property is currently zoned R-1/5,000 (Single-Family Residential District) and in order to develop the Property as intended by Developer, it is necessary to request a rezone and a master plan map amendment of the Property from R-1/5,000 (Single-Family) to the RMF-45 (Moderate/High Density Multi-Family Residential District (“*RMF-45 Zone*”).

Concurrent with this letter, Developer is submitting: (i) a General Master Plan Map Amendment Application; (ii) a General Zoning Amendment Application; and (iii) supporting materials (collectively the “*Application*”) as required by Salt Lake City (the “*City*”). The purpose of this letter is to address the Application requirements and provide written support for the Application.

1.     **Current General Plan Classification.** The current City General Plan classification for the Property is located in the Central Community district.
2.     **Current Zoning Classification.** The current City Zoning classification is R-1/5,000 (Single-Family Residential) and Low Density Residential (*See Central Master Plan*).
3.     **Requested Zoning Classification.** The Developer is requesting a Zoning Classification and change of the Zoning Map to RMF-45 Zone (*Moderate/High Density Multi-Family Residential*).
4.     **Parcel Number Change.** The Developer is requesting the Zoning Map to be amended for only one Parcel Id: 16-18-452-012-0000.
5.     **Project Description and Proposed Use.** Developer purchased the Property on October 20, 2020. Prior to Developer’s ownership, a single-family home was located on the Property which received substantial earthquake damage. As a result of such damage and for safety reasons, the home was razed, and the Property now sits vacant. Developer proposes to subdivide and construct 8 tasteful townhomes on

the Property for sale and use as a multifamily residential subdivision. Each townhome will have 4 bedrooms, 2 baths with a double car garage. There will be no on street parking.

6. **Reasons in Support of Requested Zone Change.** In support of rezoning the Property to the RMF-45 Zone, Developer respectfully requests the City to balance existing rules and regulations with flexibility for change and growth and consider the following:

(a). *General Statement.* Salt Lake City is one of the fastest growing cities in the nation and boasts a strong housing and employment market. Although this growth in population and employment supports a vibrant community, for many residents and workers, SLC is becoming a city out of reach. Similar to cities across the country, Salt Lake City is faced with housing prices that are rising more rapidly than wages, resulting in a lack of diverse and affordable housing.

To address the growth and housing challenges, over the years the City has developed goals, objectives and policies as stated through its various adopted planning documents, including, Plan Salt Lake; Salt Lake City/Citywide Vision, adopted 2015 (“**Master Plan**”); Growing SLC, A Five Year Housing Plan, (2018-2022) (“**City Housing Plan**”); Salt Lake City Consolidated Plan; Hud Program Years 2020-2024; Fiscal Years 2021-2025, (“**HUD Plan**”), Central Community Neighborhood Master Plan, adopted 2005 (“**Central Master Plan**”); Building Affordable in Salt Lake City: An Affordable Residential Development Guide, 2019 (“**Affordable Residential Guide**”); various zoning regulations (“**Ordinances**”) and other city wide and community plans, etc.

Implementing these various goals, objections and policies as reflected in the adopted planning documents requires a unique approach of balancing existing rules and regulations while exercising flexibility to achieve real and responsive change that will encourage the market to develop the diverse and affordable housing needed to accommodate the growing SLC community.

(b) *The Project is consistent with the purposes, goals, objectives and policies of the City.* The Master Plan, City Housing Plan, HUD Plan, Central Master Plan, Affordable Residential Guide and Ordinances all recognize, support and call for increasing the housing supply and expanding housing opportunities throughout the city, including removing local barriers to housing development. For example, both the Master Plan and the City Housing Plan specifically provide:

- (1) By creating places with a diverse mix of uses, building types, connections, and transportation options, people have the choice of where they live, how they live, and how they get around. As our City grows and evolves overtime, having a diverse mix of uses in our neighborhoods citywide will become increasingly important to accommodate responsible growth and provide people with real choices. See Master Plan; Sustainable Growth & Development, Page 9.
- (2) Compatibility of development generally refers to how a development integrates into the existing scale and character of a neighborhood. New development should be context sensitive to the surrounding development, taking into account the existing character of the neighborhood while providing opportunities for new growth and to enhance the sense of place. See Master Plan; Sustainable Growth & Development, Page 10.

- (3) Guiding Principle; Access to a wide variety of housing types for all income levels throughout the City, providing the basic human need for safety and responding to changing demographics; Initiatives; Increase the number of medium density housing types and options; Enable moderate density increases within existing neighborhoods where appropriate. See Master Plan, Guiding Principles and Housing Initiatives, Pages 14 & 21.
- (4) Guiding Principle; Maintaining places that provide a foundation for the City to affirm our past; Initiatives; Preserve and enhance neighborhood district character; Balance preservation with flexibility for change and growth. See Master Plan, Guiding Principles and Housing Initiatives, Pages 14 & 33.
- (5) In order to respond to Salt Lake City's changing demographics and the housing needs of its diverse communities, it is critical to begin to look within the City for real and responsive change that will encourage the market to develop the housing and infrastructure needed to accommodate our growing community. This goal focuses on the need to increase the diversity of housing types and opportunities in the city by seeking policy reforms that can enhance the flexibility of the land-use code and create an efficient and predictable development process for community growth. *See City Housing Plan, Section 3, Goal 1, Page 17.*
- (6) In order to respond to the demographic shift described above, modernizing zoning is key not only to catching up with the demand, but creating housing that responds to every stage of life whether just starting out or downsizing later in life... *In addition, there is a need for in-fill ordinances that allow for greater density in existing neighborhoods, offering owners the option to subdivide large parcels to increase the utility and value of their land, removing impediments to innovative construction types, such as accessory dwelling units, and reducing parking requirements to bring down the cost of developing new housing units. See City Housing Plan, Section 3, Objective 1.1.1, Page 18; (Emphasis Added).*
- (7) *In-fill ordinances provide both property owners and developers with options to increase the number of units on particular parcels throughout the city. Such options would also help restore the "missing middle" housing types where new construction has principally been limited to single-family homes and multi-story apartment buildings for decades. Missing middle housing types are those that current zoning practices have either dramatically reduced or eliminated altogether: accessory dwelling units, duplexes, tri-plexes, small multi-plexes, courtyard cottages and bungalows, row houses, and small apartment buildings. Finding a place for these housing types throughout the city means more housing options in Salt Lake City and restoring choices for a wider variety of household sizes, from seniors to young families. Apart from traditional infill ordinances, responding to the unusual age, form, and shape of housing stock should be addressed and leveraged to add incremental density in existing structures. This would include options for lot subdivision where there is ample space to build an additional home on a property or alternatively*

*expand rental opportunities in existing structures. This solution responds to the strong preference for single-family homes that was captured in the Salt Lake Live Work Survey. Allowing landowners to subdivide their large, underutilized lots creates a path to building more single-family homes in a city that has limited space left for them under its current land-use regulations. See City Housing Plan, Section 3, Objective 1.1.2, Page 19 (Emphasis added).*

The Project creates a real opportunity to respond to and satisfy many of the City's stated goals and objectives to find places to enable moderate density increases within existing neighborhoods to provide for a wider variety of housing types. The Property is a corner lot and is currently vacant. Developer is not requesting demolition of an existing single-family home. The Project will provide 8 residential townhomes to enhance the character of the neighborhood. The Project will create new "missing middle" housing growth on a small scale at a price point more affordable than currently exists in this area.

(c) Further Purposes of Zoning Ordinance. Developer will establish CC&R's (and, if necessary, an HOA) for the development and use of the Project in order to protect and enhance the value and desirability of the Project and to provide a clean and safe neighborhood for its residents.

(d) The Project will not materially affect adjacent properties. Developer recognizes that the Property is located in the Central Community district and subject to, among other planning documents, the Central Master Plan which provides for "preservation of historic structures and neighborhoods" as an important goal. Yet we note that the Central Master Plan was created and adopted in 2005 when market dynamics were much different and may even conflict with more modern goals and policies of the City as adopted in the Master Plan and City Housing Plan as they relate to creating a diversity of housing types in the city to address growth.

Developer believes that the Project will not fundamentally change the residential nature of the neighborhood and is willing to engage with the City on "form-based zoning" (i.e., ensuring that the form of a building fits into the neighborhood surrounding it, rather than focusing regulation on the specific use of that building as traditional zoning code requires) to tweak height, depth and general shape of the Project to best utilize the space on the Property and ensure that the residential neighborhood character is preserved and enhanced. Working with the City, the Project will be context sensitive to the existing character of the neighborhood while providing opportunities for new growth and to enhance the sense of place.

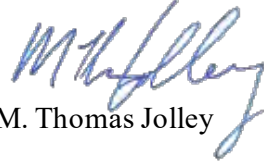
(e) Consistent Land Use. The land use of the Property will remain residential and not mixed use. Moreover, the Project is consistent with land uses immediately surrounding the Property. The St. Joseph's project is zoned RMF-35 and allows for moderate multifamily residential development. Additionally, a drive through of the surrounding neighborhoods also show various multi-family duplexes, tri-plexes and apartments that have been built over the years.

(f) Adequate Public Facilities and Services. The Project is small scale and limited to 8 residential units/lots and will have a minimal impact on traffic and other required public facilities.

We believe the Project is consistent with the City's development goals and objectives to provide diversity of housing types and to support attractive and well-maintained neighborhoods. We appreciate the City's consideration of these matters and look forward to working with you.

Best regards,

YORK HOWELL & GUYMON

A handwritten signature in blue ink, appearing to read "M. Thomas Jolley". The signature is stylized and cursive.

M. Thomas Jolley

cc: Paul Dowland  
John Davis