



Staff Report

PLANNING DIVISION

DEPARTMENT of COMMUNITY and NEIGHBORHOODS

To: Salt Lake City Planning Commission
From: Eric Daems, AICP, eric.daems@slc.gov, 801-535-7236
Date: January 14, 2026
Re: PLNPCM2025-00613 – Northpoint Industrial – Zoning Map Amendment
PLNPCM2025-00614 – Northpoint Master Plan Amendment

Zoning Map & Master Plan Amendment

PROPERTY ADDRESSES: 2669 West 3300 North
PARCEL ID: 08-09-100-002-0000
MASTER PLAN: Northpoint Small Area Plan
ZONING DISTRICTS: AG-2 (Agricultural), AFPP (Airport Flight Path Protection Overlay)

REQUEST:

Scott Bates, representing the property owners, Clark and Christine Ivory Foundation, is requesting a Zoning Map and General Plan Amendment for the property at approximately 2669 W. 3300 North. The proposal is for the property to be rezoned from AG-2 (Agricultural) to M-1A (Northpoint Light-Manufacturing) zoning district. In connection with the rezone, the Northpoint Small Area Plan is required to be updated.

The property was recently (June 2025) annexed into Salt Lake City. During their motion to approve the annexation, the Salt Lake City Council requested Administration to review the property for potential rezoning to M-1A.

The M-1A zone would allow for a wider range of uses than is permitted in the AG-2 zoning district. It would enable development of the site at a size and scale similar to that of nearby industrial uses. The property is approximately 80 acres.

RECOMMENDATION:

Based on the information and findings listed in the staff report, it is the Planning Staff's opinion that the request generally meets the applicable standards of approval for both a Zoning Map Amendment and Master Plan Amendment and therefore recommends the Planning Commission forward positive recommendations to the City Council with the following conditions:

1. A development agreement be recorded to ensure that the proposed community benefit to reserve commercial space for local businesses or charitable organizations is included in any future development on the property.
2. Applicants perform wetlands delineation study at time of any proposed subdivision of the land and prior to any development. Wetlands are to be designated as natural open space and included in the development agreement.

ATTACHMENTS:

- A. [ATTACHMENT A: Zoning and Future Land Use Maps](#)
- B. [ATTACHMENT B: Application Materials](#)
- C. [ATTACHMENT C: Property and Vicinity Photos](#)
- D. [ATTACHMENT D: Zoning Standards](#)
- E. [ATTACHMENT E: Analysis of Standards](#)
- F. [ATTACHMENT F: Public Process & Comments](#)
- G. [ATTACHMENT G: Department Review Comments](#)

PROJECT DESCRIPTION

The subject property is a single, 80- acre parcel, that is undeveloped. The applicant is requesting a Zoning Map Amendment to change the zoning of the parcel from Agricultural (AG-2) to Northpoint Light-Industrial (M-1A).

The property was recently (June 2025) annexed into Salt Lake City. It was included as part of the Northpoint Small Area Plan, which indicates a land use designation of Natural Open Space and Wetland. As such, the master plan is required to be updated in conjunction with the zone amendment.

Although the property was annexed as AG-2, during their motion to approve the annexation, the Salt Lake City Council requested the property be reviewed for a potential rezoning to M-1A.

Specific future land uses for the property have not been determined by the applicant other than to indicate they would be allowed under the light-industrial zoning and would be consistent in scale and design of nearby development.

The properties to the north, south, and west are all zoned BP (Business Park) although only one currently is developed with a warehouse/distribution center. The properties to the east include a mix

Quick Facts

Property Address: 2669 W 3300 North

Property Size: 80 acres

Existing Use: Vacant

Land Use Designation: Natural Open Space, Wetland

Existing Zoning: AG-2 (Agricultural)

Proposed Zoning: M-1A (Northpoint Light-Industrial)

Review Process & Standards: Zoning amendment, general zoning standards, general plan amendment



Current zoning map with subject property outlined in yellow

of BP (Business Park), AG-5 (Agricultural), AG-2 (Agricultural), and M-1A (Northpoint Light-Industrial) zoning designations. Each is currently used for agricultural purposes.

APPROVAL PROCESS AND COMMISSION AUTHORITY

The Planning Commission can provide positive or negative recommendations for the proposed zoning map and master plan amendments. Their recommendations will be sent to the City Council, who will hold a briefing and an additional public hearing on the proposals. The City Council may approve, deny or make modifications to proposed amendment requests as they seem fit and are not limited by any one standard.

KEY CONSIDERATIONS

The key considerations listed below were identified through the analysis of the project:

1. How the proposal helps implement city goals and policies identified in adopted plans
2. Proposed community benefit
3. Compatibility with nearby properties

Consideration 1: How the proposal helps implement city goals and policies identified in adopted plans.

The proposed rezoning is generally compatible with the city's adopted plans and policies. These are discussed below.

Plan Salt Lake (2015)

The plan identifies several principles and initiatives that the proposed map amendment helps to implement. From the Neighborhood Chapter, the following initiative applies:

- Encourage and support local businesses and neighborhood business districts.

To implement the required Community Benefit associated with a zone and plan amendment, the applicant will be providing commercial space for local businesses or charitable organizations. Staff is recommending the specifics be established through a development agreement. The M-1A zoning designation will create greater opportunities for development to accommodate local businesses than would be allowed under the AG-2 zoning designation.

In the Growth Chapter, several initiatives apply:

- Locate new development in areas with existing infrastructure and amenities, such as transit and transportation corridors.
- Encourage a mix of land uses.
- Promote infill and redevelopment of underutilized land.

The proposed map amendment is in an area that has recently had upgrades to city utilities and infrastructure. Additional upgrades will be required to be provided by developers during subdivision and building permit reviews as properties, such as this, redevelop. The area is changing from agricultural in nature to light industrial and business park. Nearby streets, including 2200 West and 3300 North, are all being improved to accommodate such development.

The proposed M-1A zone allows for a much wider range of uses than the existing AG-2. The property is currently vacant and due to the salinity of the soil, is minimally useful as agricultural land. The M-1A zoning designation would significantly increase the development options of otherwise underutilized land.

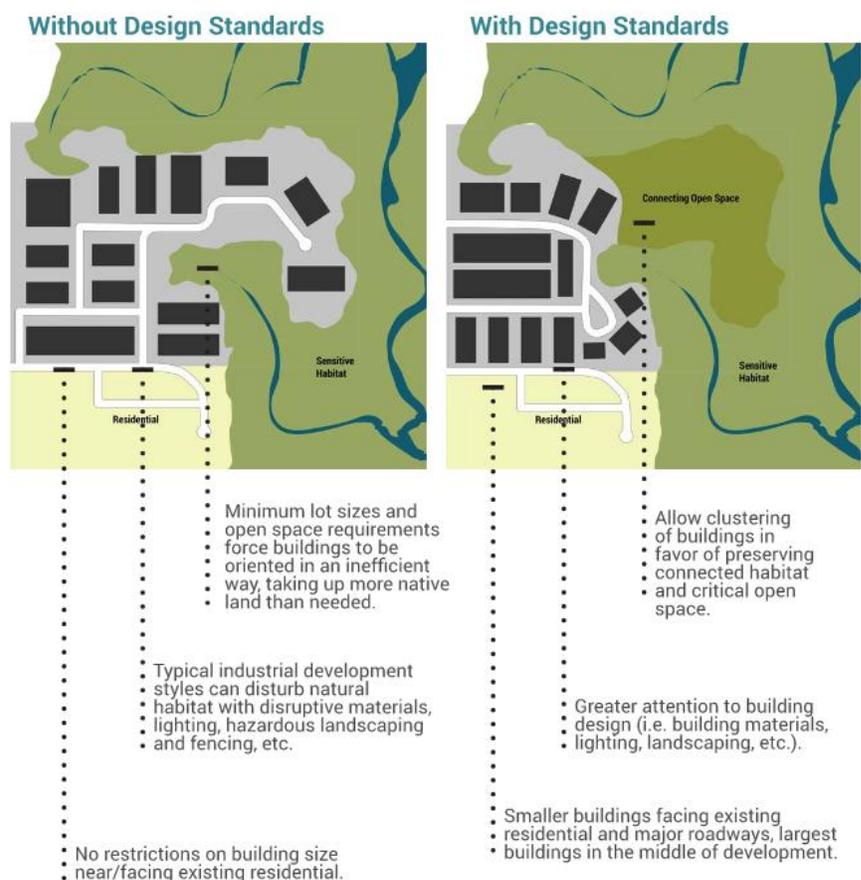
Northpoint Small Area Plan (2023)

As the property was only recently annexed into Salt Lake City, it was not included in older neighborhood master plans such as the Northwest Community Plan. However, the property area is included in the more recent Northpoint Small Area Plan.

Goals: Among the goals of the Northpoint Small Area Plan are to:

- Identify appropriate future land use and development characteristics for the area that can coexist with the wildlife habitat and natural environment of the Great Salt Lake, and the operations of the Salt Lake City International Airport.
- Identify appropriate buffering, building design, and development characteristics to reduce the impacts to residential and agricultural uses, important wildlife habitat, and other uses within the corridor.
- Recommend methods to reduce the negative impacts that future land uses may have on air quality, water quality, noise, and light.

The Northpoint Small area plan includes suggestions for implementing the plan goals. Although some have not yet been executed, the creation of the M-1A zone was in direct response to these goals and is one of the primary implementation mechanisms currently in place. The zone includes standards intended to mitigate impacts of development and to protect sensitive natural lands. Rezoning this property to M-1A would ensure that new development would be compatible with surrounding properties while implementing measures to protect the natural environment. Those standards are examined more fully in [Consideration 3](#) of this report.



Excerpt from Northpoint Small Area Plan Showing Sample Design Standards

The following statement from the Northpoint plan also indicates support for sensitive redevelopment of the land in the area:

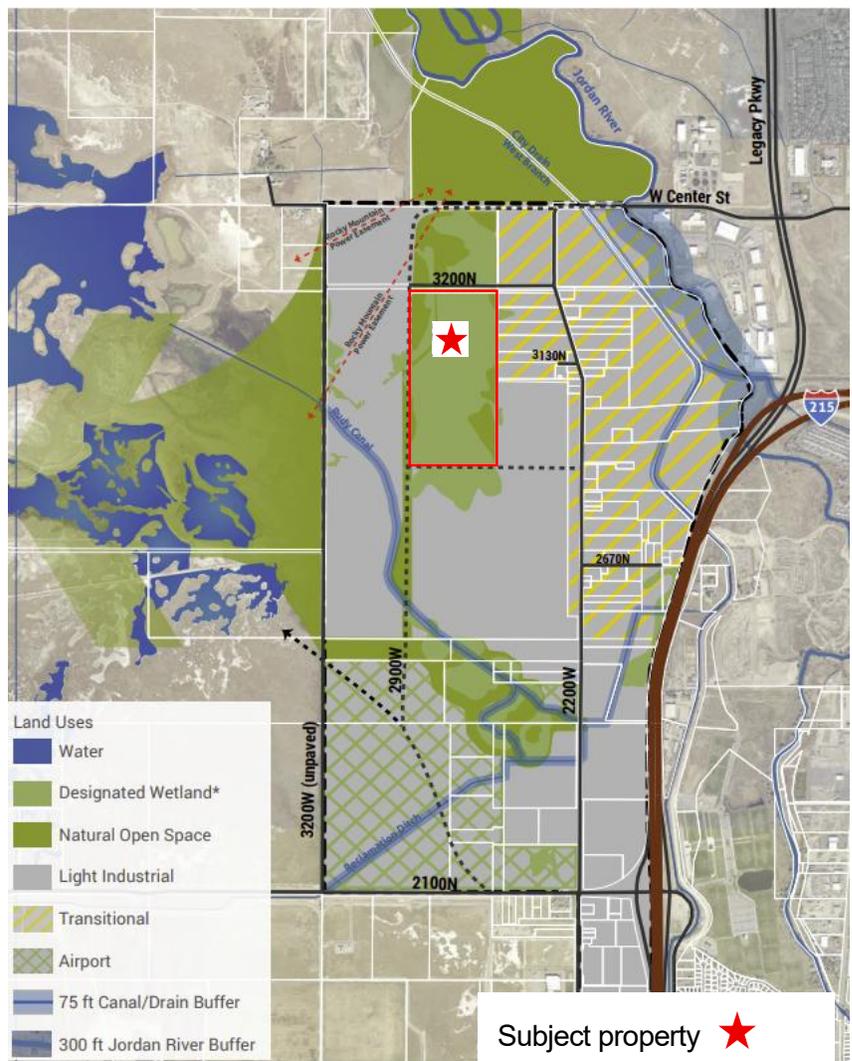
“Northpoint represents an opportunity for Salt Lake City to encourage economic development that is compatible with the unique natural and built environment of the area, including proximity to the Salt Lake City International Airport. This area is best suited for business park and industrial development...”

The proposed zoning map amendment is generally compatible with the goals and implementations strategies as outlined in the Northpoint Small Area Plan.

Future Vision Map: The Northpoint Small Area Plan includes a Vision Map of future land uses. The map was created prior to this property being annexed into Salt Lake City but assumed it eventually would be. The plan identifies the property as a mix of wetland and natural open space. However, it also includes the following note:

“Wetlands include both jurisdictional and non-jurisdictional wetlands. The Vision Map is intended as a general guide for wetland areas, but specific wetland delineation should be done when land is developed. Identification of wetlands primarily involves the determination of three factors: the predominance of wetland vegetation, hydric (wetland) soils, and signs of hydrology.”

For this reason, staff is recommending that a specific wetlands delineation be performed along with any future subdivision or building permits. Identified wetlands would then need to be protected as natural open space while light-manufacturing uses in accordance with the M1-A zone would be allowed on the other portions of the property.



Northpoint Small Area Plan- Vision Map

Consideration 2: Proposed community benefit

Each petition for a zoning map amendment that is initiated by a private property owner is required to select at least one community benefit that would be implemented as part of the rezone. Potential community benefits to be included are found in [21A.50.050.C](#) of the zoning code and to be something that would not otherwise be required without the amendment. The applicant is proposing the following community benefit:

1) Commercial space for local businesses and charitable organizations

At this stage, specific development of the site has not been envisioned. The applicant has indicated the desire to develop the site in a manner consistent with nearby light-manufacturing development with tenant space reserved for local businesses or charitable organizations. Given the potential land uses available in the M1-A zone, this type of community benefit would be appropriate.

Staff is comfortable working out the details of the amount of commercial space for local businesses or charitable organizations during review of the development agreement. See additional info in [Attachment B](#).

Consideration 3: Compatibility with nearby properties

Context

Apart from a few small agriculturally zoned properties to the east, the property is surrounded by BP or M-1A zoning on all four sides. The 434-acre Scannel Logistics campus (BP zone) nearly surrounds the property. Although not all of it is yet developed, the surrounding area is quickly changing from agricultural to light industrial and warehouse in nature.

Compatibility

The proposed M-1A zoning is generally compatible with surrounding properties. The site development standards of the M-1A are less intense than the surrounding BP zoned Scannel properties. The M-1A requires greater setbacks, lower building height, and more stringent site, design, and environmental standards than the BP zone.

- 1) Purpose Statements and Allowed Uses:** The purpose statements for the current and proposed zoning districts contain similarities in that they both seek to preserve sensitive lands.

The AG-2 purpose statement:

The purpose of the AG-2 Agricultural District is to preserve and protect agricultural uses in suitable portions of Salt Lake City on lots not less than two (2)



**Scannel Logistics Campus-
Subject property outlined in
yellow**

acres. These regulations are also designed to minimize conflicts between agricultural and non-agricultural uses.

The M-1A purpose statement:

The purpose of the Northpoint District is to protect sensitive lands and wildlife habitat surrounding the Great Salt Lake shore lands and the Jordan River while providing an environment for light industrial, office, and research uses that produce minimal impact on adjacent residential and agricultural properties. This district is appropriate within the Northpoint Small Area Plan boundaries and other areas with similar attributes. The district promotes a high standard of building design quality, open space preservation, and protection of sensitive lands and waterways.

The AG-2 primarily accomplishes its purpose by reducing options for development and only permitting the types of uses that are less impactful to the natural environment. It is important to note that although the uses are less impactful to the environment, in many cases, they would still alter the natural landscape. Examples of uses permitted in the AG-2 zone that could substantially alter the natural landscape include agriculture, wind farms, utility buildings, and single-family dwellings.

Overall, the M-1A zone allows a larger mix of land uses, including light-manufacturing, but it also includes design standards (described more fully below) intended to minimize impacts to surrounding properties and sensitive lands that are not required in the AG-2 zone. A complete list of allowed uses in each district is detailed in Attachment D of this report.

- 2) Site, Design, and Environmental Standards:** The proposed M-1A zoning district contains site, design, and environmental standards intended to implement its purpose statement to protect sensitive lands and reduce impacts on surrounding lands. These include:
- Building size limited to under 100,000 square feet or subject to additional review and compatibility standards
 - Landscaping requirements allowing only native and water-wise trees and plants
 - Required landscape plan to remove and control noxious weeds
 - Street trees selected from Salt Lake City Plant List
 - Building materials that harmonize with the natural environment such as brick, natural stone, textured concrete, and wood
 - Low solar reflective index roofing
 - Bird-friendly glass
 - Dark sky appropriate lighting
 - Wildlife friendly fencing
 - Environmentally friendly stormwater treatment and management

Each of these standards seeks to balance the desire for light-manufacturing type land uses with greater environmental protection and overall compatibility with surrounding properties. They also help implement the goals expressed in the Northpoint Master Plan. In addition to the base zoning requirements, Staff also recommends that a wetlands delineation process be completed at the time of subdivision or building permits on the property. Any wetlands identified would then be designated as natural open space, giving further protection to the sensitive lands.

STAFF RECOMMENDATION

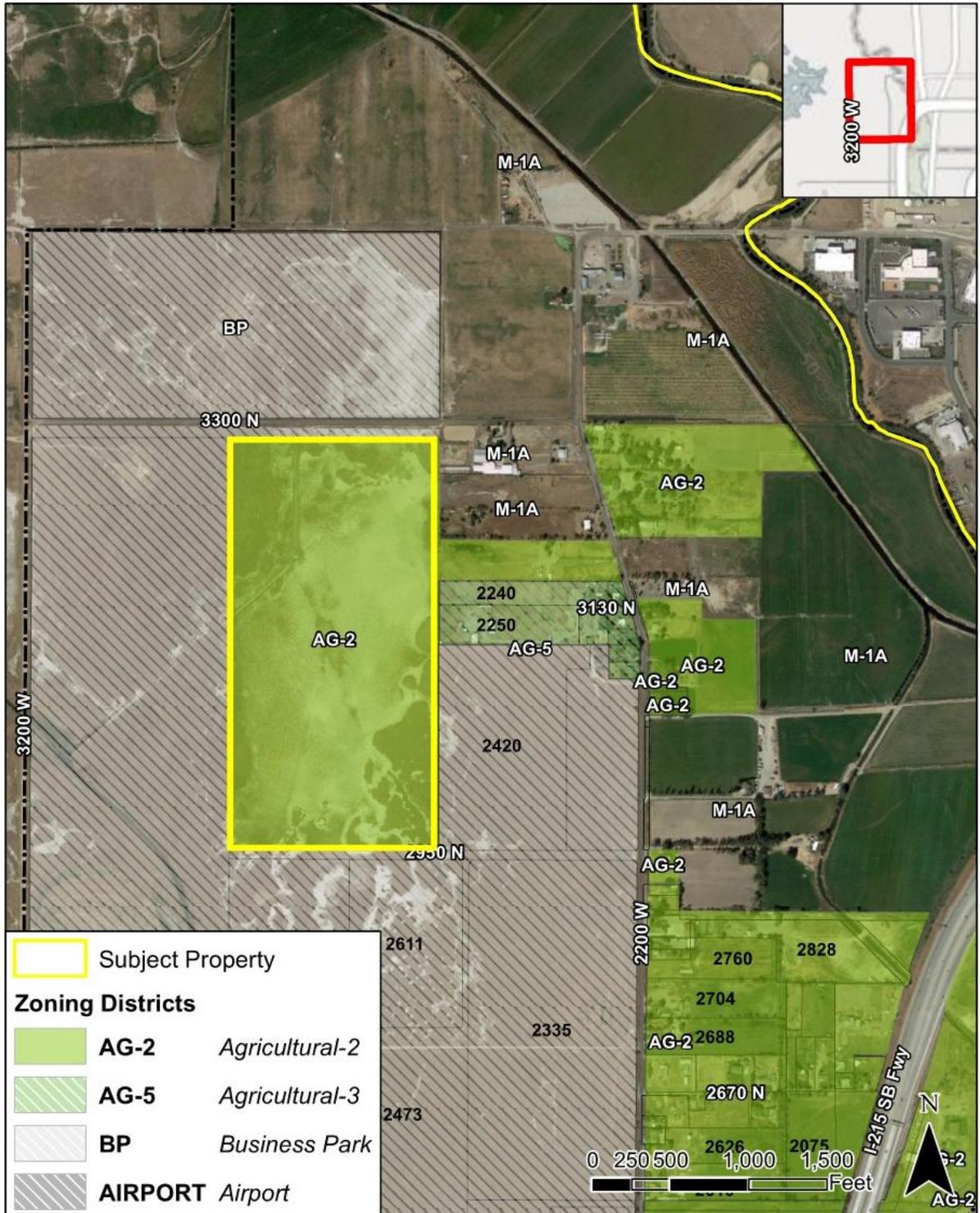
Based on the findings and analysis in this staff report and the factors to consider for zoning map amendments in 21A.50.050 of the zoning ordinance and the factors to consider for a general plan amendment in 19.06.070, Planning Staff recommends that the Planning Commission forward a positive recommendation to the City Council for the proposed Zoning Map Amendment and Master Plan Amendment with the following recommendations:

1. A development agreement be recorded to ensure that the proposed community benefit to reserve commercial space for local businesses or charitable organizations is included in any future development on the property.
2. Applicants perform wetlands delineation study at time of any proposed subdivision of the land and prior to any development. Wetlands are to be designated as natural open space and included in the development agreement.

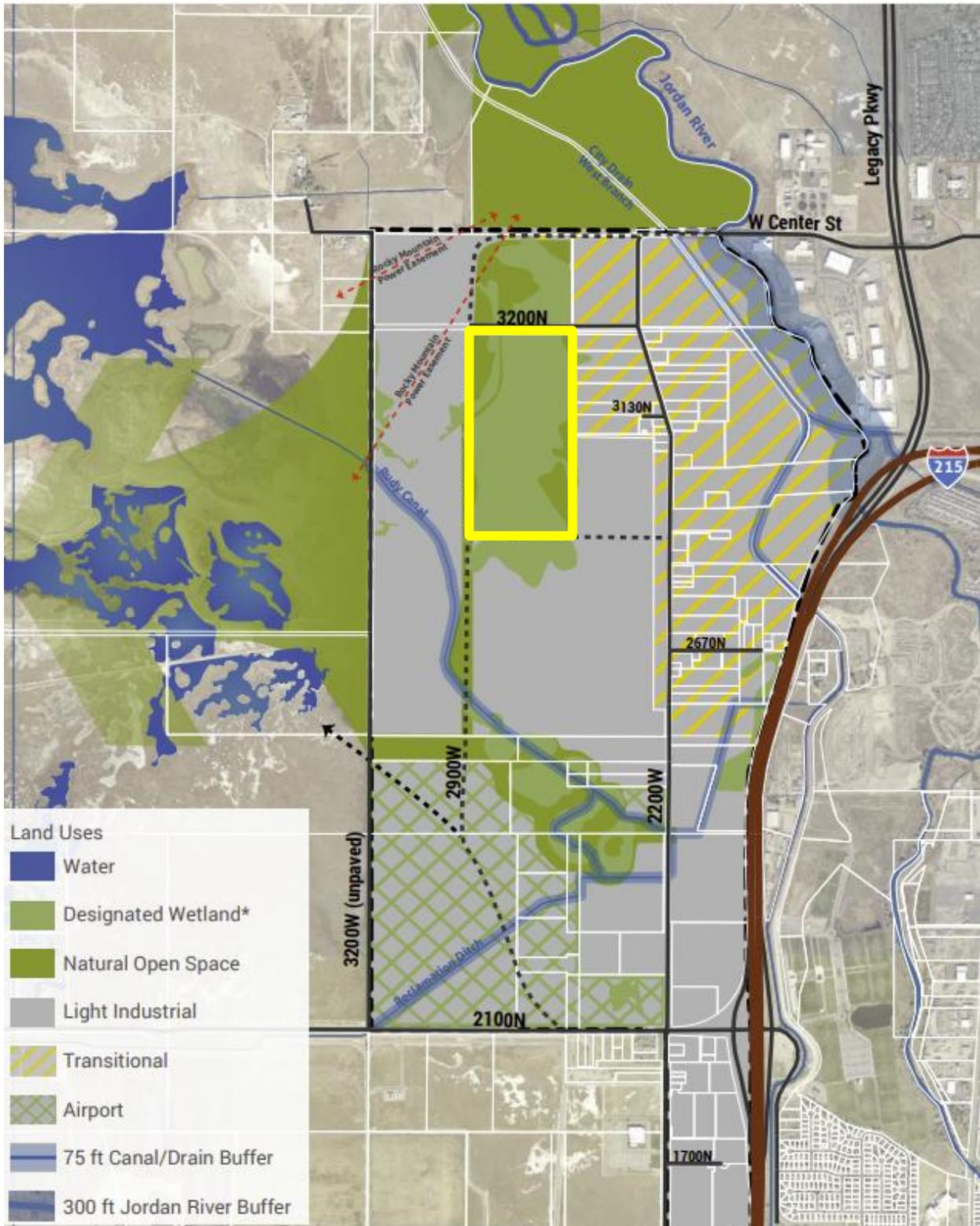
NEXT STEPS

The Planning Commission's recommendations will be forwarded to the City Council for their consideration as part of the final decision on these petitions.

ATTACHMENT A: Zoning and Future Land Use Maps



Current Zoning of Property and Vicinity



***Future Land Use Map- Northpoint Small Area Plan
(property outlined in yellow)***

ATTACHMENT B: Application Materials

ZONING AMENDMENT

REQUIREMENTS

A statement declaring the purpose and justification for the proposed amendment.

Re-zone Subject Property from AG-2 to MI-A Light Industrial in connection with General Plan Amendment; and consistent with the recent Northpointe Annexation and maximize the use of the Subject Property similar to other surrounding properties that were annexed into Salt Lake City.

The proposal is consistent with the goals, policies, or implementation actions of the general plan, including applicable element plans.

The Northpointe Annexation and associated zoning changes constitute significant change that warrants the creation of a new plan or an update to an adopted plan.

The goals, policies, or implementation actions of the plan to be amended are no longer relevant to or capable of addressing the current issues or needs of the neighborhood or the city, or are no longer aligned with policies in citywide plans.

The proposed amendment will effectively and proportionally increase the public benefit proposed by the petitioner to a commensurate increase in development potential if adopted by the city council.

The proposal will not displace people who reside in any housing that is within the boundary of the proposed amendment.

The proposal will not displace of any business that is located within the boundary of the proposed amendment.

The proposal will not significantly impact properties in the immediate vicinity as the planned development will be consistent with the existing and planned industrial development properties.

Significant infrastructure has been developed in conjunction with city and surrounding developers under a DA, which will allow the city to provide safe drinking water, storm water, and sewer to the property.

The proposal will not strain public safety resources as it is consistent with surrounding light industrial uses that do not foster crime or high traffic use for the general public normally associated with high density residential and/or high traffic commercial and retail uses.

Again, due to the major infrastructure development completed and planned under the existing DA, impacts to any other city service, infrastructure, or resources will not be burdensome by the increase in development potential that may result from the proposed amendment.

A written description of the proposed modification to the general plan, including any changes to the future land use map, future land use designation, or description of scale and density/intensity of the proposed change. Any proposed amendment to the text of the plan shall include the exact proposed text & changes that are proposed in a strike and underline format.

N/A

If the request is specific to a property, please list the parcel numbers and a map that shows the current use of the subject property and adjacent properties.

08-09-100-002-0000

A written general description of any future development that is planned for the property including the anticipated use, density, scale of development, timing of development, the anticipated impact to existing land uses and occupants of the land subject to the proposal and any additional land use petitions that may be anticipated to develop the site. Visual renderings and basic site plans may be provided by the applicant.

Generally, the planned development is in the early stages of land use design and planning. However, the it is anticipated that the ultimate uses will be largely consistent with those allowed by MI-A Light Industrial zone and other developers' surrounding existing and planned development in terms of design, density, and scale with no significant additional impact to surrounding occupants or uses.

COMMUNITY BENEFIT

A written description regarding the proposed community benefit(s) associated with the amendment. The description shall adequately describe the necessary details to demonstrate that the proposed community benefit is roughly proportionate to the potential increase in development right if the proposed amendment were to be adopted. See 19.06.070.C for a list of community benefits that can be proposed.

Providing commercial space for local businesses or charitable organizations.

Expanding public infrastructure that expands capacity for future development.

The percentage of space allocated to commercial use compared to the total ground floor area that could be developed on the site

DATA COLLECTION

For nonresidential properties, the following information must be provided:

Details on the nature of the existing and prior use;

Vacant land. Historically use is agricultural.

Square footage of the leasable area:

Not Applicable.

Detailed list of current or prior occupants;

Not Applicable.

The current cost to lease and the cost to lease for the previous 36 months.

Not Applicable.

GENERAL PLAN AMENDMENT

REQUIREMENTS

A statement declaring the purpose and justification for the proposed amendment.

Re-zone Subject Property from AG-2 to MI-A Light Industrial in connection with General Plan Amendment; and consistent with the recent Northpointe Annexation and maximize the use of the Subject Property similar to other surrounding properties that were annexed into Salt Lake City.

The proposal is consistent with the goals, policies, or implementation actions of the general plan, including applicable element plans.

The Northpointe Annexation and associated zoning changes constitute significant change that warrants the creation of a new plan or an update to an adopted plan.

The goals, policies, or implementation actions of the plan to be amended are no longer relevant to or capable of addressing the current issues or needs of the neighborhood or the city, or are no longer aligned with policies in citywide plans.

The proposed amendment will effectively and proportionally increase the public benefit proposed by the petitioner to a commensurate increase in development potential if adopted by the city council.

The proposal will not displace people who reside in any housing that is within the boundary of the proposed amendment.

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The proposal will not significantly impact properties in the immediate vicinity as the planned development will be consistent with the existing and planned industrial development properties.

Significant infrastructure has been developed in conjunction with city and surrounding developers under a DA, which will allow the city to provide safe drinking water, storm water, and sewer to the property.

The proposal will not strain public safety resources as it is consistent with surrounding light industrial uses that do not foster crime or high traffic use for the general public normally associated with high density residential and/or high traffic commercial and retail uses.

Again, due to the major infrastructure development completed and planned under the existing DA, impacts to any other city service, infrastructure, or resources will not be burdensome by the increase in development potential that may result from the proposed amendment.

A written description of the proposed modification to the general plan, including any changes to the future land use map, future land use designation, or description of scale and density/intensity of the proposed change. Any proposed amendment to the text of the plan shall include the exact proposed text & changes that are proposed in a strike and underline format.

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Generally, the planned development is in the early stages of land use design and planning. However, the it is anticipated that the ultimate uses will be largely consistent with those allowed by MI-A Light Industrial zone and other developers' surrounding existing and planned development in terms of design, density, and scale with no significant additional impact to surrounding occupants or uses.

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For nonresidential properties, the following information must be provided:

Details on the nature of the existing and prior use;

Vacant land. Historically use is agricultural.

Square footage of the leasable area:

Not Applicable.

Detailed list of current or prior occupants;

Not Applicable.

The current cost to lease and the cost to lease for the previous 36 months.

Not Applicable.

Clark and Christine Ivory Foundation

Parcel ID: 08-09-100-002-0000



ATTACHMENT C: Property and Vicinity Photos



Subject Property (looking south from 3300 North)



Property to the north- across 3300 North



Property to east



Typical light-manufacturing development in the area



Typical agricultural use in the area

ATTACHMENT D: Zoning Standards

The proposed M-1A zoning district has different development standards from the existing AG-2 zoning district. A comparison follows:

CURRENT AND PROPOSED ZONING STANDARDS (21A.28.040 and 21A.32.052)

REGULATION	AG-2 (existing)	M-1A (proposed)
Maximum Lot Area	None	10 acres or larger according to 21A.28.040.I
Building Height	Single-family or small group homes: 35 ft Agricultural or conditional uses: 45 ft	40 ft
Minimum Front Setback	Single-family or small group homes: 30 ft	20 ft
Maximum Front Setback	200' for primary residential structure	None
Corner Side Setback	Single-family or small group homes: 30 ft	20 ft
Interior Side Setback	Single-family or small group homes: 35 ft	15 ft
Rear Setback	None required	15ft
Additional Setbacks	None	Principal structures must be at least 65' from residential structures on abutting properties. Vehicle laneways must be at least 30' from principal residential structures on abutting properties.
Open Space, Landscape Yards, and Landscape Buffers	20%	20%

The M-1A zone contains additional standards pertaining to the following:

- Buffer yards from the Jordan River
- Building size limits- limited to 100,000 sq ft without additional processes and standards
- Landscaping requirements
 - Native and water-wise plants
 - Landscaped yards
 - Street and landscape trees
 - Elimination and control of noxious weeds
- Design standards in addition to those found in 21A.37
 - Blank walls
 - Building materials
 - Roofs
 - Glass
 - Lighting
 - Fencing
 - Stormwater management

New buildings within both the AG-2 and M-1A are subject to additional design standards (found in Chapter 21A.37). However, each district's specific requirements differ. The table below summarizes what is required within each district.

CURRENT AND PROPOSED DESIGN STANDARDS (21A.37.050)

REGULATION	AG-2	M-1A
Ground Floor Use % (21A.37.050.A)		
Building Materials, ground floor (21A.37.050.B.3)		
Building Materials, upper floors (21A.37.050.B.4)		
Glass: ground floor (21A.37.050.C.1)		
Glass: upper floor (21A.37.050.C.2)		
Reflective Glass (21A.37.050.C.3)		
Building Entrances (21A.37.050.D)		
Blank wall Maximum Length (21A.37.050.E)		
Street Facing Façade, max length (21A.37.050.F)		
Upper floor step back – upper level front (21A.37.050.G1)		
Upper floor step back: landmark (21A.37.050.G2)		
Lighting: exterior (21A.37.050.H)		Yes
Lighting: parking lot (21A.37.050.I)		Yes
Screening of mechanical equipment (21A.37.050J)		
Screening of service areas (21A.37.050K)		
Parking garages or structures (21A.37.050.L)	Yes	Yes
Public Improvements (21A.37.050.M)	Yes	Yes

ALLOWED USES IN EACH ZONE:

Land use tables for each zone are below for reference. Cells are bolded where uses or status (permitted or conditional) differ.

Use	AG-2	M-1A
Accessory use , except those that are specifically regulated elsewhere in this title	P	P
Adaptive reuse of a landmark site		
Agricultural use	P	P
Alcohol:		
Bar establishment		C
Brewpub		C
Distillery		C
Tavern		C
Winery		C

Use	AG-2	M-1A
Ambulance service (indoor and/or outdoor)		P
Animal:		
Cremation service		P
Kennel on lots of 5 acres or larger	P	
Pet Cemetery	P	P
Stable (private)	P	
Stable (public)	P	
Stockyard		C
Veterinary office		P
Antenna, Communication Tower	P	P
Antenna, Communication Tower exceeding the maximum height in the zoning district		C
Artisan food production		P
Bakery, commercial		P
Bio-medical facility		P
Blacksmith shop		P
Brewery		P
Building materials distribution		P
Bus line station/terminal		P
Bus line yard and repair facility		P
Cannabis production establishment	P	P
Commercial food preparation		P
Community garden	P	P
Contractor's yard/office		C
Crematorium		C
Data center		P
Daycare center, adult		P
Daycare center, child		P
Dwelling:		
Accessory unit	P	
Group home (small)	P	
Living quarter for caretaker or security		P
Manufactured home	P	
Single-family detached	P	
Equipment, heavy (rental, sales, service)		P
Equipment rental (indoor and/or outdoor)		P
Farm stand, seasonal	P	
Financial institution with or without drive- through facility		P
Food processing		P
Gas station		C
Government facility	P	P
Government facility requiring special design features for security purposes		P

Use	AG-2	M-1A
Grain elevator		C
Greenhouse		P
Home occupation	P	P
Hotel/Motel		P
Impound lot		P
Industrial assembly		P
Laboratory, medical related		P
Large wind energy system	C	
Light manufacturing		P
Limousine service		P
Mobile food business (operation in the public right-of-way)		P
Mobile food business (operation on private property)		P
Municipal service uses, including City utility uses and police and fire stations	P	P
Office		P
Office, publishing company		P
Open space	P	P
Park	P	P
Parking:		
Commercial		P
Off site		P
Parking and ride lot shared with existing use		P
Photo finishing lab		P
Printing plant		C
Radio, television station		P
Recreation (indoor)		P
Recreation (outdoor)		P
Recycling:		
Collection station		P
Processing center (indoor)		C
Research and development facility		P
Restaurant with or without drive-through facilities		P
Retail goods establishment with or without drive-through facility		P
Retail service establishment		P
Electronic repair shop		P
Furniture repair shop		P
Upholstery shop		P
School:		
Professional and vocational (with outdoor activities)		P
Professional and vocational (without outdoor activities)		P
Seminary and religious institute		P
Seasonal farm stand		P

Use	AG-2	M-1A
Small brewery		P
Solar array		P
Storage and display (outdoor)		P
Storage, public (outdoor)		P
Storage, self		P
Store, convenience		P
Studio, motion picture		P
Taxicab facility		P
Technology facility		P
Tire distribution retail/wholesale		P
Truck freight terminal		P
Urban farm	P	P
Utility, building or structure	P	P
Utility, solid waste transfer station		C
Utility, transmission wire, line, pipe or pole	P	P
Vehicle:		
Automobile and truck repair		P
Automobile and truck sales and rental (including large truck)		P
Automobile part sales		P
Automobile salvage and recycling (indoor)		P
Recreational vehicle (RV) sales and service		C
Truck repair (large)		P
Vending cart, private property		P
Warehouse		P
Welding shop		P
Wholesale distribution		P
Woodworking mill		P

ATTACHMENT E: Analysis of Standards

ZONING MAP AMENDMENTS

21A.50.050.B: A decision to amend the text of this title or the zoning map by general amendment is a matter committed to the legislative discretion of the city council and is not controlled by any one standard. In making a decision to amend the zoning map, the City Council should consider the following:

1. Whether a proposed map amendment is consistent with and helps implement the purposes, goals, objectives, and policies of the city as stated through its various adopted planning documents;

Finding: Complies

Discussion: The proposed map amendment is substantially consistent with the purposes, goals, objectives, and policies of the city's various adopted planning documents. See Key Consideration 2 for review of the city's adopted planning documents. The proposed map amendment is generally consistent with these documents.

2. Whether a proposed map amendment furthers the applicable purpose statements of the zoning ordinance;

Finding: Complies

Discussion: The proposed map amendment is consistent with the general purpose and intent of the city's zoning ordinance. The potential for light-industrial type uses would serve to foster the city's industrial and business development and create additional jobs for residents. The M-1A zone also includes design standards that serve to protect the environment.

The proposed map amendment would generally be consistent with the purpose statement of the M-1A zoning district. See additional discussion in Key Consideration 2.

General Purpose and Intent of the Salt Lake City Zoning Ordinance

The purpose of the zoning ordinance is to promote the health, safety, morals, convenience, order, prosperity, and welfare of the present and future inhabitants of Salt Lake City, to implement the adopted plans of the city, and, in addition:

- A. Lessen congestion in the streets or roads;
- B. Secure safety from fire and other dangers;
- C. Provide adequate light and air;
- D. Classify land uses and distribute land development and utilization;
- E. Protect the tax base;
- F. Secure economy in governmental expenditures;
- G. Foster the city's industrial, business, and residential development; and
- H. Protect the environment.

Current Zoning District Purpose Statement

AG-2 Agricultural District

Purpose Statement: The purpose of the AG-2 Agricultural District is to preserve and protect agricultural uses in suitable portions of Salt Lake City on lots not less than two (2) acres. These regulations are also designed to minimize conflicts between agricultural and non-agricultural uses. This district is appropriate in areas of the City where the applicable Master Plans support this type of land use.

Proposed Zoning District Purpose Statement

M-1A Northpoint Light Industrial District

Purpose Statement: The purpose of the Northpoint District is to protect sensitive lands and wildlife habitat surrounding the Great Salt Lake shore lands and the Jordan River while providing an environment for light industrial, office, and research uses that produce minimal impact on adjacent residential and agricultural properties. This district is appropriate within the Northpoint Small Area Plan boundaries and other areas with similar attributes. The district promotes a high standard of building design quality, open space preservation, and protection of sensitive lands and waterways.

General Purpose of the Zoning Amendments Process

The purpose of this chapter is to provide standards and procedures for making amendments to the text of this title and to the zoning map. This amendment process is not intended to relieve particular hardships nor to confer special privileges or rights upon any person, but only to make adjustments necessary in light of changed conditions or changes in public policy.

3. The extent to which a proposed map amendment will affect adjacent and nearby properties due to the change in development potential and allowed uses that do not currently apply to the property;

Finding: Complies

Discussion: The proposed map amendment will allow for additional development potential and uses compared to the existing zoning district. See additional information in Key Consideration 2. The property is surrounded on three sides with BP-Business Park and M-1A Northpoint Light-Industrial zoning. This amendment would continue the development pattern in the area and would be compatible with surrounding properties.

4. Whether a proposed map amendment is consistent with the purposes and provisions of any applicable overlay zoning districts which may impose additional standards;

Finding: Complies

Discussion: The property is subject to the Airport Flight Path Protection Overlay. Future development will be reviewed for complete compliance with that overlay.

5. The adequacy of public facilities and services intended to serve the subject property, including, but not limited to, roadways, parks and recreational facilities, police and fire protection, schools, stormwater drainage systems, water supplies, and wastewater and refuse collection.

Finding: Complies

Discussion: The subject property is located within a built environment where public facilities and services already exist. Some of the public utilities in the area were recently upgraded. Redevelopment of this property may be able to tie into existing systems, or depending on the intensity of the development, may require upgrading or installation of utilities and drainage systems. Those systems would all be reviewed based on proposed developments and be the responsibility of the developer to install.

No concerns were received from other City departments regarding the zoning amendment or the potential for development on these properties as long as normal development requirements are met.

6. The status of existing transportation facilities, any planned changes to the transportation facilities, and the impact that the proposed amendment may have on the city's ability, need, and timing of future transportation improvements;

Finding: Complies

Discussion: Transportation did not have concerns with the rezone. A traffic impact study may be required at the building permit stage.

7. The proximity of necessary amenities such as parks, open space, schools, fresh food, entertainment, cultural facilities, and the ability of current and future residents to access these amenities without having to rely on a personal vehicle;
Finding: Complies
Discussion: The proposal will be adjacent to similar light-industrial type development and will serve to create jobs for the area. It will not include a residential component or alter services or amenities for daily living.
8. The potential impacts to public safety resources created by the increase in development potential that may result from the proposed amendment;
Finding: Complies
Discussion: Police did not have concerns with the rezone but will review future development plans to mitigate safety issues during the construction stage.
9. The potential for displacement of people who reside in any housing that is within the boundary of the proposed amendment and the plan offered by the petitioner to mitigate displacement;
Finding: Complies
Discussion: There is no existing housing on the property.
10. The potential for displacement of any business that is located within the boundary of the proposed amendment and the plan offered by the petitioner to mitigate displacement;
Finding: Complies
Discussion: The land is currently undeveloped.
11. The community benefits that would result from the proposed map amendment, as identified in Section 21A.50.050.C;
Finding: Complies
Discussion: See discussion in Key Consideration 2 and below. The proposed community benefit complies.

GENERAL PLAN AMENDMENTS

19.06.070: The intent of this section is to establish a list of factors that the planning commission and city council should consider when evaluating a proposed plan or plan amendment. Each factor should be considered with the understanding that not all factors will be applicable to all petitions.

A. If an amendment is approved by the city council, no certificate of occupancy shall be issued until the property owner demonstrates compliance with the council approval, an applicable development agreement, and this chapter if required by the approval.

B. Consideration Factors: In reviewing a proposal to modify the general plan, the planning commission and city council should consider, but are not limited to, the following factors:
1. Whether the proposal is consistent with citywide policies.
Finding: Complies
Discussion: The proposal is substantially consistent with the purposes, goals, objectives, and policies of the various adopted planning documents. See Key Consideration 2 for review of the city’s adopted planning documents.

<p>2. Whether the proposal is consistent with the goals, policies, or implementation actions of the general plan, including applicable element plans.</p>
<p>Finding: Complies</p>
<p>Discussion: The creation of the M-1A zone was in response to the goals and objectives of the Northpoint Small Area Plan. It is intended to implement the goals through the standards it contains. This property will better accomplish the vision of the master plan by developing under the M-1A zone.</p>
<p>3. Whether significant change has occurred that warrants the creation of a new plan or an update to an adopted plan.</p>
<p>Finding: Complies</p>
<p>Discussion: The Northpoint Small Area plan was adopted recently; however, this land was only annexed into the City in June of this year. At the time of annexation, the Salt Lake City Council requested that the property be reviewed for a potential rezone to M-1A.</p>
<p>4. Whether the goals, policies, or implementation actions of the plan to be amended have been achieved, are no longer relevant to or capable of addressing the current issues or needs of the neighborhood or the city, or are no longer aligned with policies in citywide plans.</p>
<p>Finding: Complies</p>
<p>Discussion: The proposed amendment does not alter goals or policies of the general plan, rather it helps implement them by developing under the more stringent standards of the M-1A zone. That zone was specifically created with standards that incorporate goals and policies of the Northpoint Small Area plan.</p>
<p>5. For petitions submitted by a property owner, the extent, effectiveness, and proportionality of the public benefit proposed by the petitioner to the increase in development potential if the proposal were to be adopted by the city council.</p>
<p>Finding: Complies</p>
<p>Discussion: The land is currently vacant and has limited development potential under the AG-2 zoning designation. The M-1A will allow for commercial space for local businesses or charitable organizations. Staff recommends a development agreement be recorded with the zone amendment to ensure compliance with this provision.</p>
<p>6. The potential for displacement of people who reside in any housing that is within the boundary of the proposed amendment and the plan offered by the petitioner to mitigate displacement.</p>
<p>Finding: Complies</p>
<p>Discussion: There is no residential uses within the land proposed to be rezoned.</p>
<p>7. The potential for displacement of any business that is located within the boundary of the proposed amendment and the plan offered by the petitioner to mitigate displacement.</p>
<p>Finding: Complies</p>
<p>Discussion: There is no development on the property.</p>
<p>8. The potential impacts to properties in the immediate vicinity of the proposal.</p>
<p>Finding: Complies</p>
<p>Discussion: Future development would be compatible in scale and intensity with surrounding zoning as the majority already allows light-manufacturing or business park style development.</p>
<p>9. The potential impacts on the city to provide safe drinking water, storm water, and sewer to the property based on the additional development potential of future development.</p>
<p>Finding: Complies</p>

Discussion: No concerns were received from Public Utilities regarding the amendment or the potential for development on these properties if normal development requirements are met. Future development may require installation or upgrades to public utilities, which is typical among all new construction.

10. The potential impacts to public safety resources created by the increase in development potential that may result from the proposed amendment.

Finding: Complies

Discussion: Police did not have concerns with the rezone but will review future development plans to mitigate safety issues during the construction stage.

11. The potential impacts to any other city service, infrastructure, or resource that may be impacted by the increase in development potential that may result from the proposed amendment.

Finding: Complies

Discussion: Impacts created by future development would be similar to those created by nearby developments. The property has similar zoning on three sides and is in an area transitioning from agricultural to light-manufacturing.

COMMUNITY BENEFIT STANDARDS

21A.50.050.C: Each petition for a zoning amendment that is initiated by a private property owner shall identify community benefit(s) provided by the proposal that would not otherwise be provided without the amendment as provided for in this section.

Type of Community Benefit

1. The proposed community benefit(s) shall be within any of the following categories:

- a.** Providing housing that aligns with the current or future needs of the community as determined by the general plan. Needs could include the level of affordability in excess of the number of dwellings that exist on the site, size in terms of number of bedrooms, or availability of housing for purchase;
- b.** Providing commercial space for local businesses or charitable organizations;
- c.** Providing a dedication of public open space;
- d.** Providing a dedication or other legal form of protection from future development of land that is adjacent to a river, creek, wetland, floodplain, wildlife habitat, or natural lands;
- e.** Preserving historic structures not otherwise protected;
- f.** Expanding public infrastructure that expands capacity for future development.

Finding: Complies

Discussion: The applicant plans to provide commercial space for local businesses or organizations. See discussion in Key Consideration 2 for more information.

Community Benefit Standards

21A.50.050.C.2: The Proposed Community Benefit May be evaluated based on the following, if applicable:

a. For proposals that are intended to increase the housing supply, the level of affordability of the additional density that may be allowed if the proposal were to be adopted;

Finding: NA

Discussion: NA

b. The percentage of space allocated to commercial use compared to the total ground floor area that could be developed on the site;
Finding: Complies
Discussion: The applicant has committed to providing commercial space for local businesses or charitable organizations. Staff recommends that a development agreement be required in which specific space requirements would be established. See discussion in Key Consideration 2.
c. The size of the public open space compared to the total developable area of the lot, exclusive of setbacks, required landscaped yards, and any open space requirement of the proposed zoning district;
Finding: NA
Discussion: NA
d. The relative size and environmental value of any land that is to be dedicated;
Finding: NA
Discussion: NA
e. The historic significance of the structures proposed to be preserved;
Finding: NA
Discussion: NA
f. The amount of development that could be accommodated due to the increase in public infrastructure capacity compared to the general need for the area;
Finding: NA
Discussion: NA
g. The input received related to the community benefit during the 45-day engagement period;
Finding: Complies
Discussion: No comments related to the community benefit were received.
h. Policies in the general plan that support the proposed community benefit.
Finding: Complies
Discussion: The proposed community benefit to provide commercial space for local businesses or charitable organizations is supported by policies in Plan Salt Lake. These are detailed in Key Consideration 2.

ATTACHMENT F: Public Process & Comments

Public Notice, Meetings, Comments

The following is a list of public meetings that have been held, and other public input opportunities, related to the proposed project since the applications were submitted:

- September 10, 2025 – Notice of the proposed amendment was posted on the property
- September 11, 2025 - Property owners and residents within 300 feet of the development were provided early notification of the proposal.
- September 15, 2025 – The Westpointe Community Council and Board were sent the 45-day required notice for recognized community organizations. No comments were received from the community council.

Notice of the public hearing for the proposal included:

- December 26, 2025
 - Public hearing notice sign posted on the property
- December 30, 2025
 - Public hearing notice mailed
 - Public notice posted on City and State websites and Planning Division listserv

Public Input:

The following public comments have been received in response to this petition:

Letter from Rudy Reclamation and Sportsman’s Club- Received 12/3/2025 (see next page)

Comments of Rudy Reclamation and Sportsman's Club to Ivory Development's Request for Rezone of 2669 West 3300 North

Rudy Reclamation and Sportsman's Club, preserving over 1,800 acres of critical wildlife habitat since 1909, submits the following comments regarding the requested rezone of 80 acres at 2669 W 3300 North, Salt Lake City (the "Parcel"). The Parcel is very close to some of the most sensitive, productive and ecologically important wetland complexes remaining on the south shore of the Great Salt Lake. See Attachment A.

Both nature and heritage combine in the lands surrounding the Parcel. As explained below, these values have been recognized in the City's prior planning efforts including the recently adopted North Point Area Plan, the Salt Lake County General Plan for the area, and affirmed by the State of Utah in the Migratory Bird Production Area Act and should be reflected in any decision on rezoning. We ask that any development be cautiously managed in a way that fully protects critical wildlife areas.

Ivory Property: The Ivory Property is almost entirely comprised of a playa. A playa is a dry shallow basin much of the year. It fills with water after rain or snow and provides favored and critical habitat for many bird species. Most playas associated with the south shore are gone, except on a few private preserves. The Ivory Property playa is one of the last large playas in this area. The City has recognized the sensitive and important nature of this property in its recent North Point planning efforts.

Rudy Property: From its inception in 1909, Rudy Reclamation played a prominent role in these efforts. Rudy Reclamation has shown steadfast dedication to the perpetuation of a marvelous environmental resource and the way of life that surrounds it. The Rudy Property is an absolutely essential component of the remaining south shore habitat. Several playas and alkali knolls are close to the Ivory Property. This area is vital nesting and migratory habitat to dozens of bird species, most of which do not tolerate high levels of development, traffic and artificial light according to the United States Fish and Wildlife Service. (See 2.b below)

Salt Lake City has Recognized the South Shore Natural Values in its Northwest Quadrant, North Point, and Inland Port Planning Efforts

At various times, the City has undertaken efforts to plan for the development of the Northwest Quadrant. While the Parcel is not in the common boundaries of the NWQ or Inland Port, it shares the same values that were important features of planning in that area. A key component of the eventual plan was the creation of a Natural Area that arced across the northern margin of the NWQ. The Natural Area reflected a consensus agreement of the NWQ landowners, City, NGOs and surrounding landowners. This was intended both to preserve the environmentally sensitive and low lying areas within the Natural Area as well as to provide an essential buffer to the adjacent migratory bird production areas. Other design features were also incorporated to reduce the development's impact on surrounding wetland complexes.

These were largely incorporated into Inland Port planning and zoning. **The Ivory development will be far closer to critical GSL habitat than the Inland Port.**

The City recently undertook a planning effort for the North Point Area and designated the Parcel as an area that should be protected. The City's Vision Map for the area identifies the Parcel as one that should be preserved.

Also, the City proposed a bold effort to preserve lands adjacent to the Parcel. The importance of this land and the need for its preservation were explicitly detailed by the City in its request for funding to the Great Salt Lake Watershed Enhancement Trust. Both the Trust's technical advisory committee and its Advisory Council affirmed the importance of the project and approved the request for funding.

Taken as a whole, the City has repeatedly affirmed the value of these habitats and the need to protect them.

State Legislative Recognition of the Importance of the South Shore Natural Values

The State has also recognized the value of these privately managed areas by enacting legislation that provides them with various protections and classifies them under Utah law as "migratory bird production areas." Utah Code Ann. 23-28-101, *et seq.* On the south shore, these MBPAs include Rudy Reclamation, various duck clubs, the Audubon Gillmor Sanctuary and the Inland Sea Shorebird Reserve. As such, they are entitled to certain protections and their traditional activities cannot be prohibited. Moreover, the Act contemplates that if development occurs adjacent to an MBPA, the adjacent landowner cannot complain of or alter the management of the MBPA.

Taken as a whole, the State has repeatedly affirmed the value of these habitats and the need to protect them.

Specific Considerations Relating to the Rezoning Request

1. **Location of high impact development away from wetlands and MBPAs:** High impact uses such as rail lines, rail yards, high structures, heavy industry, fuel and chemical storage, and natural resource storage should be distant from 3200 West. Development in the Parcel should be reserved for uses that are most compatible with uses on surrounding land and the character of the area.
2. **Buffering:**
 - a. Given the sensitivity of the wetland areas and the species dependent on them, there should be limits that create a visual, noise and light buffer between development and 3200 West. This is critical to address the effects of the proximity of lighting, noise, activity, increased traffic and structure height. The City should consider limiting uses, planning development, and imposing conditions on buildings, lighting, noise and uses. Please remember that thousands of pairs of shore birds, waterfowl and raptors nest on the Rudy

Reclamation property, including by the playas adjacent to 3200 West. Noise, lighting, increased traffic and other activity might drive them from their nests. Nesting habitat on the south shore is limited and precious.

- b. The U.S. Fish and Wildlife Service has recently reminded the State of the serious nature of these indirect impacts in the context of the West Davis Corridor. As noted in the November 7, 2018 letter, these serious impacts to birds and their habitat extend far beyond the 300' to which the State was hoping to limit its responsibility. The same effects will occur with this development. The letter reads in part:

We have consistently commented that our greatest concern with the West Davis Corridor is the indirect effect to the wetland and wildlife habitats on the shore lands of the Great Salt Lake. We believe the applicant has underestimated the level and extent of indirect effects to migratory birds by limiting the study area to a 300 foot buffer of the ROW. A variety of factors influence the likelihood for wildlife to use habitat adjacent to roadways. These factors include weed introduction, barriers to movement, visual disturbance, and edge effects. Specific to migratory birds, impacts include lowered occupancy, reduced breeding density, and increased mortality in habitats adjacent to roadways; we previously provided you with a literature review of these impacts in a whitepaper (USFWS 2013). Based on this available science, we expect impacts to extend over a kilometer (3,900 feet) from roadways for some species, with greater impacts occurring in closer proximity to roads.

3. **Surface water flow: There is a high risk for contamination of sensitive wetland areas.**
 - a. One of Rudy Reclamation's main water sources (the Rudy Drain) transits close to the Parcel. This supplies water to playas near to 3200 West and other wetlands in that area.
 - b. There is also a small irrigation canal along the west side of 3200 West that provides water to the playas on the Rudy property.
 - c. In addition, there are surface flows and a very shallow water table that flow towards wetland areas including Rudy Property.
 - d. Water must be aggressively treated in a location and way that will require it to transit through the migratory bird production areas. Substances that contain PFAS, deicing agents, fertilizer, petroleum products, and other chemicals should not be allowed on development on the Parcel.
4. **Surface water quality:** Surface water and ground water should be protected from leaks, discharges and fugitive dust. Waste, trash, debris, fill or other materials and deleterious substances should not be allowed to enter either of the water conduits in 3.a and 3.b above or to flow on the surface or in groundwater towards wetlands. Storage tanks, oil and gas transfer and other liquids should not be permitted where a leak may occur into

wetlands or waterways that lead to wetlands. An incident response plan should be required.

5. No effect on traditional MBPA activities: Compatibility with existing uses is one of the policy mandates of the MBPA Act. Development that would be incompatible with (by restricting, limiting or precluding) wildfowl management, hunting and associated activities should be modified, changed in location or not be permitted.
6. Light pollution: Lighting should incorporate best practices for bird friendly lighting.
7. Building Height: Buildings and other structures such as antennae, guy wires or smoke stacks should be limited to 35 feet.
8. Utility and transportation corridors:
 - a. Development that requires a utility corridor, power lines, road or access through or adjacent to MBPAs and similar areas should be modified, changed in location or not be permitted. Such corridors should avoid those areas. They are directly incompatible with and do not complement uses on MBPAs or the need for preservation of natural values that the City has also recognized and incorporated into its planning efforts.
 - b. 3200 West should not be expanded or paved where it is next to Rudy Reclamation due to the impact it will have on adjacent habitat.
9. Noise pollution:
 - a. Development should minimize noise disruption. Development that is likely to have considerable noise should be sited away from wetland areas.
 - b. **A noise/visual barrier between development and wetland areas should be required.**
10. Bug abatement: Higher levels of mosquito abatement will be requested. Also, more toxic pesticides may be needed for deer flies and other biting insects. Both of these will adversely affect the macroinvertebrates that form the nutritional backbone of the marshes for many bird species. Alternatives should be explored regarding this issue.
11. Bird friendly design: Best practices should be required. For instance, the buildings should not have windows on the west facing windows. Also, guy wires on towers should be avoided.
12. Air Pollution: Industries and activities that would emit toxic fumes should not be permitted.
13. Invasive species: Plant species that might become invasive in the wetland areas should be avoided.
14. Trespass prevention: Fencing, gates or other barriers should be considered to minimize the risk of trespass.
15. Access preservation: Access for the owners and users of the MBPAs and similar areas should be preserved.

History and Significance of the South Shore of the Great Salt Lake Including the Rudy Property

The Great Salt Lake is a cardinal feature of the Salt Lake Valley and the City's namesake. The Great Salt Lake, at its average elevation of 4,200' above sea level, covers about 1,700 square miles. It provides respite and nutrition to seemingly untold numbers of migratory fowl. The lake annually hosts millions of birds (some 250 species) including 75% of the continental population of tundra swans, 40% of the continental population of eared grebes, 12% of the continental breeding population of American pelican (one of the four largest breeding colonies in North America), 27% of the continental breeding population of cinnamon teal (the single most important breeding site in North America for this small duck), 52% of the continental population of American Avocets and 50% of the continental population of Wilson's Phalaropes. The GSL hosts more bird life than any other saline lake in North America and possibly the entire Western Hemisphere. If it were lost, several bird populations in the western half of North America would risk collapse and the effects would be felt as far as South America.

Critical to this bird life is the fertile crescent of freshwater marshes and adjacent salt-loving vegetated mudflats and that curve roughly from Saltair on the south to the Promontory Peninsula on the north. The habitat in this crescent plays an outsize part in preserving the lake's critical wildlife role. Without it, the lake would be wholly unsuitable for sustaining the overwhelming majority of bird life.

In the Salt Lake Valley, the fertile crescent historically extended south along the Jordan River and in a succession of lakes, sloughs and playas¹ that ended around 2700 South. Most of those in Salt Lake County south of I-80 or east of Redwood Road are long since lost to memory and buried under refineries, rail yards, the airport and houses. What is left is largely concentrated north and west of the Salt Lake International Airport including. Ironically, the Parcel is largely a single playa. Without these areas, the south shore would become a comparatively sterile area and the lake would lose a large portion of its wildlife value.

This south shore area has only survived because of the tenacious stewardship and perseverance of its owners over many decades. As the 20th century opened, duck hunting became all the rage locally and groups of waterfowlers began to acquire land north, west or south of the City. The duck clubs were credited with preserving, enhancing and creating habitat on the south shore. Characteristic of what many observers noted, one reporter wrote: "The advent of the duck club, an organization hardly known a couple of years back, is doing wonders for the game in this state. Nearly all of the available duck shooting grounds [by Salt Lake City] are now controlled by some one or other of these clubs and the club members are doing more to protect the nests, the young and the ducks out of season than the law itself." SLH, September 25, 1904.

It is important to remember that in that era in our nation, draining marshes and building over playas was almost considered a duty. Reflecting this attitude, there was a steady stream of proposals to dewater or plow under all the land north and west of the City. Although

extensive wetland areas were incrementally lost over the years, many of Utah's citizens chose instead to acquire this land, on the margins of the state's largest city, for its wildlife values and to nurture and preserve it in the face of development pressures. Because their dedication has persevered over the past century, we have a natural realm on the south shore that is vibrant, productive and irreplaceable. Waterfowlers and the owner-managers of these areas simply wish to keep it that way.

We would welcome the opportunity to meet with Planning Department staff or others to explain these comments and the purpose for them. Please contact Taylor DeBry at [REDACTED] or Jack Ray at [REDACTED] to arrange a meeting or to request additional information.

Respectfully,

Rudy Reclamation and Sportsman's Club

Follow up email from Jack Ray about the letter from Rudy Reclamation and Sportsman's Club- Received- 1/7/2026

Eric,

I am writing to clarify that Rudy opposes the rezone of this property. The proposed rezone is contrary to Salt Lake City's planning efforts and policies as well as contrary to the planning and policies of Salt Lake County and the State of Utah. Those planning efforts and policies are explained in greater detail in our comments submitted on December 3, 2025.

If you have any questions or were not able to download our comments, please let me know.

Thank you,

Jack Ray
[REDACTED]

Email from R. Jeff Richards- Received 1/7/2026

Mr. Daems,

On behalf of the North Point Duck Club we want to add support the comments previously submitted by the Center for Biological Diversity and the Rudy Duck club opposing the proposed rezone of land located at 2669 West 3300 North. The North Point owns and manages approximately 2,500 acres of land west of 3200 West. We manage this land for the benefit of migratory birds and other wildlife and have done so for more than 100 years. We agree with the comments previously submitted and believe that it is not necessary to reiterate those here in our opposition but do need to make clear that we agree with the reasons and basis for that opposition. We further believe this rezone flies in the face of and is contrary to the Shorelands Preservation efforts that have been adopted to preserve the integrity of this area.

If you have any questions regarding this matter please do not hesitate to call me at [REDACTED].

R. Jeff Richards
North Point Duck Club

Email from Allison Musser (on behalf of names listed at end of email)- Received 1/7/2026

Dear Salt Lake City Planning Commission:

We, property owners and residents of Northpoint, are writing to express opposition to Petition PLNPCM2025-00613 and PLNPCM2025-00614 submitted by the Clark & Christine Ivory Foundation and the Salt Lake City Council to amend the General Plan and Zoning Map at approximately 2669 W 3300 N from Natural Open Space and wetlands to Light Industrial.

The requested amendment directly contradicts the adopted Northpoint Small Area Plan. The City's plan identifies Natural Open Space and wetland areas as land that should be preserved and protected due to their ecological significance, proximity to the Great Salt Lake, and their role in flood mitigation, habitat connectivity, and water quality. These lands are designated as least

suitable for development and are intended to remain undeveloped except for passive recreational uses.

The Plan further establishes that industrial and business park zoning is appropriate only in areas without significant environmental constraints such as wetlands, sensitive uplands, or other major limitations. Rezoning designated natural open space and wetlands to light industrial use conflicts with this framework and undermines the City's stated goal of directing development away from sensitive lands.

Additionally, the Northpoint Small Area Plan emphasizes minimizing negative impacts to air quality, water quality, wildlife habitat, and nearby residential uses. Expanding industrial zoning into protected wetland areas runs counter to these objectives and increases environmental and infrastructure risks in an area the City has already identified as environmentally constrained.

These substantive conflicts alone provide sufficient grounds to deny this petition.

Further, the public input process associated with this application was incomplete. The initial 45-day Public Input Notice characterized the request as only a rezoning from AG-2 to M-1, and failed to disclose that the property is designated as Natural Open Space and wetlands in the adopted General Plan—or that amending the General Plan would be required. This information was later included in the Planning Commission notice, demonstrating that it is material to the City's review. The omission deprived surrounding property owners and residents of the opportunity to meaningfully comment based on complete and accurate information.

For these reasons, we respectfully urge the City to deny Petitions PLNPCM2025-00613 and PLNPCM2025-00614 as inconsistent with the adopted Northpoint Small Area Plan. If the City elects not to deny the petition outright, the public input process should, at a minimum, be restarted with full and accurate disclosure before any further consideration.

If you have any questions please contact Allison Musser at [REDACTED] to arrange a meeting or request additional information.

Thank you for your time and consideration.

Sincerely,

Jeremy and Allison Musser
Bobby and Angela Taylor
Anthony and Natalie Thomasson
Ricky and Chamaine Nelson
Brittney Souther
Patti Jensen

Letter from Deeda Seed- Received 1/7/2026 (see next page)

Comments from the Center for Biological Diversity on Ivory Development's Request for Rezone of 2669 West 3300 North

The Center for Biological Diversity is a national non-profit conservation organization with more than 1.8 million members and online activists dedicated to the protection of endangered species and wild places. Over the last 5 years the Center has been focusing resources on the campaign to save Great Salt Lake, and in particular, Great Salt Lake Wetlands. During this time we have actively engaged with Salt Lake City to address threats related to Great Salt Lake wetlands within the city boundaries.

For over five years we have been working on issues in the Northpoint Area with community members, as well as other non-profit environmental and community organizations. Our goal is to protect people, wildlife and wetlands from environmental harm. We engaged on issues related to the creation of the Northpoint Small Area Plan, and the conceptual Shoreline Heritage Preservation Plan and supported the conservation measures in these plans. Unfortunately the city seems poised to sweep away all of that work by so many people. It is important that this 80 acre wetland area be protected as a wetland.

The following birds have been identified in and around the parcel of concern:

172 species of birds

- WILSON'S PHALAROPE
- 16 species of duck (cinnamon teal, northern shoveler, northern pintail, green-winged teal, mallard, gadwall, American wigeon, canvasback, bufflehead, redhead, common merganser, ring-necked duck, blue-winged teal, ruddy duck, hooded merganser, red breasted merganser)
- 17 species of raptors (bald eagle, golden eagle, ferruginous hawk, rough-legged hawk, Cooper's hawk, red tailed hawk, sharp-shinned hawk, Swainson's hawk, prairie falcon, osprey, northern harrier, merlin, American kestrel, American barn owl, short-eared owl, great horned owl, burrowing owl)
- Sandhill cranes
- 5 species of grebe
- 7 species of goose

We request that the planning commission make a negative recommendation with regard to upzoning of this parcel for the following reasons:

1) Upzoning this property will destroy 80 acres of important and increasingly scarce wetland playa, and will harm adjacent wetlands and duck clubs.

This is one of the last large playas in this area, and the city recognized the importance of this area in its Northpoint Small Area Plan.

2) Salt Lake City’s recently adopted Northpoint Small Area Plan calls for this parcel to remain undeveloped.

The City recently undertook a planning effort for the Northpoint Area and designated the Parcel as an area that should be protected. The City’s Vision Map for the area identifies the Parcel as one that should be preserved.

3) Salt Lake City (council and Mayor) have expressed concern regarding the drying of Great Salt Lake and the loss of wetlands and pledged to support conservation.

In May of 2023, [we also got verbal commitments from the city supporting conservation of Great Salt Lake wetlands from Mayor Mendenhall.](#)

And, the city successfully secured multiple funding streams (including from [the Great Salt Lake Watershed Enhancement Trust](#), and Utah Inland Port Authority) to “protect and restore riparian areas, wetlands, and upland habitat near the south shorelines of Great Salt Lake through acquisition and conservation easements on 200 acres of property.”

Also of note is [Salt Lake County’s recent step to protect wetlands north of the Northpoint area by declining to upzone an area to light industrial.](#)

4) Only Salt Lake City can protect this wetland playa

Due to a recent [U.S. Supreme Court decision](#), wetland playas are no longer protected under the federal Clean Water Act. The devastating consequence for many places in the western United States, including Utah, is that ephemeral wetlands (wetlands that are only wet periodically) are no longer protected. According to an estimate by the [Natural Resources Defense Council](#), [41-93% of Utah’s wetlands could lose federal protection](#). Thus, it is all the more important that Salt Lake City protects these places.

5) Upzoning will irrevocably seal the fate of this land as another wetland lost to industrial development

In addition to the harms to wildlife habitat, Salt Lake City will have to contend with even more diesel truck traffic and all the air, water, light and noise pollution associated with more industrial development. This places a tremendous burden on residents in the surrounding communities and the city in general.

6) Mitigation measures are not the solution as they frequently fail or are not even implemented.

Frequently city officials suggest mitigation measures to compensate for wetland harm. Unfortunately this approach doesn't have a good track record. For example, all sorts of problems are arising with the industrial development in the Utah Inland Port Area, which is new city subsidized industrial development similarly located in and near wetlands. Many mitigation measures were promised but few if any have been implemented. The buffer that was supposed to be created has not been. And, the adjacent so-called natural area has been inundated with uncontrolled polluted stormwater, as well as human trespassers now that roads extend up to it (to name a few issues).

For these reasons we request that the Salt Lake City Planning Commission make a negative recommendation with regard to upzoning of this parcel.

Sincerely,
Deeda Seed
Senior Utah Campaigner
Center for Biological Diversity

ATTACHMENT G: Department Review Comments

This proposal was reviewed by the following departments. Any requirement identified by a City Department is required to be complied with.

Engineering:

Corey Legge - corey.legge@slc.gov 801-535-6159

No objection and no comments during this phase of the development process.

Fire:

Doug Bateman – douglas.bateman@slc.gov 801-535-6619

No comments at this time. Any future development or building permit application will need to meet minimum adopted fire and life safety codes.

Urban Forestry:

Rick Nelson – [rick.nelson@slc.gov](mailto:rnick.nelson@slc.gov) 801.972.7839

Urban Forestry has no concerns with this proposal.

Police:

Andrew Cluff – andrew.cluff@slc.gov 801-799-3805

No public safety concern with the rezone.

Public Utilities:

Kristeen Beitel – kristeen.beitel@slc.gov 801-483-6733

Public Utilities has no issues with the proposed Zone and Master Plan Amendment. Please note that any development on this parcel must meet all Public Utilities requirements, including fees and reimbursements to recently installed public utility mains and potentially installation of new public utility mains or facilities. It is highly recommended that the applicant consult with Public Utilities once the specific land use is identified to understand utility constraints and requirements for the specific land use on the site. There are several ongoing projects in the vicinity to increase public utility capacities. Pioneering agreements and reimbursement agreements will be encountered with any development on this property.

If the parcel will increase in densification, future development applicants should also be aware of the potential increase in construction costs resulting from required offsite utility improvements, potentially downstream of the subject property. Densification may place greater demands on water, sewer, and storm drain systems, which could exceed the capacity of the existing infrastructure. Property owners and developers will be required to upgrade the offsite public utilities to ensure sufficient capacity for the new development.

Building Code:

Heather Gilcrease – heather.Gilcrease@slc.gov 801-535-7163

There are no building code comments during this phase of the development process.

Transportation:

Jena Carver – jena.carver@slc.gov 801-573-5058

No comments during this phase of the development process.

Airport:

Lisa Garmendia – lisa.garmendia@slc.gov 801-575-2987

The proposed rezoning is compatible with land use around the airport so we have no additional comments.

Public Services:

Jorge Chamorro – Jorge.chamorro@slc.gov 801-604-0056

No objection- Other than pointing out that the potential increase in density on these properties could lead to a higher roadway use and in turn a shorter maintenance cycle and an increase in our operational budget (exact cost is difficult to project at this time) there are no additional comments from the Public Services Department.

Housing Stability:

Tony Milner – Tony.milner@slc.gov 801-535-6168

No objection.

City Attorney:

Courtney Lords – Courtney.lords@slc.gov 801-535-6285

No objection.

Economic Development:

Peter Makowski – peter.makowski@slc.gov 801-535-7159

Economic Development supports this rezone and has no questions or concerns.