

## FINDINGS

The amended SDMP does not meet the intent and vision for the R/M-U zone, as it does not address all of the technical items required by the zone regulations.

- The SDMP, as outlined does not comply with the 2007 Holladay General Plan (Cottonwood Mall Element – Small Area Master Plan) for this particular area of the city, as well as overall compatibility with Chapters 1-8 of the larger General Plan.
  - a. The proposed SDMP does not:
    - i. Support the development of a flexible, appealing, and mixed-use project with retail, office and residential uses within the same structure. (Planning Objectives - Appendix F Cottonwood Mall Master Plan Language) The weighting below does not constitute mixed-use
      - 1. Proposed SDMP Office/Retail of 11%. Existing SDMP 27%.
      - 2. Proposed SDMP Residential of 57%. Existing SDMP 36%.
    - ii. There is a significant commercial vs residential disparity between the existing SDMP and proposed plan.
- Recent proposed amendments to the SDMP by the developer since the beginning of calendar year in terms of stepping of building mass and building height, reduction of maximum building height, internal vehicular access and enhanced pedestrian access between the mixed use and lower density areas, proposed pedestrian accesses to, and through the site, including a substantial trail amenity along Big Cottonwood Creek, expansion of green space within the site, “festival space”, etc., the courting of a significant office tenant, have significantly reduced several areas of concern noted by staff in the 1/2/18 report and address concerns expressed by Holladay residents as well. However, the amendments still fall short of integrating the office, retail and residential into a mixed use development.
- Overall, the Plan arguably misses the balance between a mixed-use plan where residential, commercial and office work together to create a blended development. This plan eliminates the mixed use on approximately 70% of the project by introducing a roadway and emergency access only traffic between the limited mixed use and the larger single-family subdivision. This layout does not hold on to past development patterns while addressing future resource restrictions and demographics.
- The proposed SDMP does not contribute to the long range goal of environmental and economic sustainability of the City and high quality of life because it does not provide a balance of lifestyle arrangements and shopping, dining, employment opportunities. The proposed plan is for a large single family neighborhood on 2/3 of the property and a variable plan of office, retail and multi-family depending on the market changes over the next 8-10 years.
- It also represents a very inefficient use of a critically located parcel of land by providing primarily a place for many people to live with a proposed 1123 to 1268 single family units while significantly under-developing the commercial/office/retail from 450,000sf to as low as 110,000sf for residents to /work/dine/shop/recreate in a relatively small area of land. Vertical development pressure will increase dramatically everywhere along the Wastach Front as population projections predict massive population change. This will still be true for areas considered more desirable such as Holladay even though they do not have much open land left. Also, the extension of infrastructure to more remote areas will become more costly than to upsize in areas already developed. However, Objective 3 in the Holladay General Plan states: “The primary goal of the General Plan is to provide clear and accurate policies that will help the City...protect and preserve the existing character of the community.”
- The proposal, if approved, converts vacant land in a **mixed use** zone with a very clearly laid out site development plan, to a heavily weighted single family development undermining the requirements for development in the zone to offer a great mix of commercial office, retail and restaurant.
- Over a period of years, the development, if done correctly, will enhance the community’s overall sense of place as it has its own identity which will at the same time create a contrast between itself and other “nodes” in the community such as the Village and the Holladay Crossroads areas. A sense of place here can be achieved with an integrated site plan, superior building design, finishes, orientation and attention to detail.
- Submitted traffic studies have been generated by the applicant, reviewed by City appointed third party consultants and recommendations made to the applicant. The studies conclude that there is sufficient street capacity and signalization to handle anticipated traffic. Given that it will take a number of years

to fully build all the uses on the site, it will also take an equivalent number of years to realize the maximum impact of traffic produced by this site. By that time, most drivers will become accustomed to the increased traffic and may opt to amend driving behaviors to compensate for peak driving times. Additionally, emerging technologies, such as Autonomous Vehicles (AV) may decrease congestion by increasing efficiency in movement and parking, reduce parking space demand, etc.

- Cut through traffic into site streets and neighborhoods will result during construction and at peak times when the site is fully built out. Cut through restrictions or temporary signage or other deterrence will need to be implemented to protect surrounding neighborhoods from unsafe traffic and speeds on roads where sidewalks do not exist.
- Building heights are an integral part of the overall design and function of the project and are not warranted in this area of the city where direct, measurable visual impacts on surrounding residential areas will not be minimal. The proposed max. heights of buildings is much reduced from the initial fall 2017 submittal, and represents less **overall** mass and height compared to the 2007 SDMP but still falls short of the existing 90' maximum or 5 stories including screening walls, architectural features and mechanical systems.
- The proposed SDMP amendment is too vague and although it may reflect current housing and commercial trends, it allows for far too much and unreasonable flexibility in their application to help minimize risk of economic downturn and to maximize economic development potential. Nowhere else in the City or any time prior has the City recommended or approved a plan that gives so much control and latitude to a developer or landowner. The proposed amendment to the plan must provide an updated or replacement plan with all or the details and requirements specified in the application, not a generic plan that gives control to the developer and removes the City from the process.
- The proposed SDMP places too much emphasis for future populations and today's rapidly evolving demographic trends such as smaller, lots and homes for "millennials" and those that will follow, including single level living for some seniors, a range of flexible apartment choices for a wide range of current and future Holladay residents, and prestigious townhome and detached single family dwellings. Holladay is a unique City and does not necessarily follow state and national trends of smaller lots and apartments. Existing and potential Holladay residents do not find themselves in the same demographics that drive the statistics towards small lots and apartments. A broad assortment of residential offerings from larger single family estate homes to smaller lots and townhomes will support the Holladay General Plan.
- This new Plan, even if built at the maximum allowed in all land use categories, would result a more modest community node than can already be found in many other Salt Lake valley (and abutting) communities, and much smaller than future large-scale development that will occur elsewhere. This is due to the increased amount of residential and the lack of commercial, retail, office and restaurant that is detailed in the existing mixed use plan.
- The density proposed is significant, and, in the long-term, too significant for the existing Holladay traffic and City infrastructure. Doubling the single family units is not necessary to support existing and future commercial uses both on-site and in abutting commercial areas to the west, northwest and north.
- The proposed residential density is located where it can best be handled. However, the proposed residential density is over double what is approved in the existing SDMP. Also, a general rule of thumb in land use planning is that it is better to place density, such as in the Holladay Village, it where it has already been, or where there is density in the immediate vicinity, than to move density to a location where it has never been.
- The proposed amendment does not "Support the development of a flexible, appealing, and mixed-use project with retail, office and residential uses in the same structure. " from the Master Plan Appendix F.