

**Millcreek City Council**

Cheri Jackson, Mayor  
Silvia Catten, District 1  
Thom DeSirant, District 2  
Nicole Handy, District 3  
Bev Uipi, District 4



**Millcreek City Hall**

1330 East Chambers Avenue  
Millcreek, Utah 84106  
Millcreekut.gov  
801-214-2700

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ZM-25-006

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## Planning Commission Staff Report

**Meeting Date:** 12/17/2025

**Applicant:** Preston Reading

**Re:** Request to Remove Zoning Condition

**Property Address:** 777 East 3900 South

**Zone:** Residential Mixed (RM)

**Prepared By:** Zack Wendel

**Scope of Decision:** **Discretionary.** This is a legislative matter, to be decided by the Millcreek City Council upon receiving a recommendation from the Community Council(s) and the Millcreek Planning Commission. Your recommendation can be broad in scope, but should consider prior adopted policies, especially the Millcreek General Plan.

## REQUEST AND SYNOPSIS

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Preston Reading, on behalf of Pacifica Companies, is requesting to rezone the property located at 777 E 3900 S to remove a zoning condition that has been placed on the property. The property is currently zoned as Residential Mixed (RM) which allows multiple-household buildings. However, there is a zoning condition placed on this property that limits residents of the facility to 62 years or older.

The applicant is requesting the removal of the zoning condition, so there is no age restriction, and the property can be used as a 55+ senior living facility. The property will stay zoned as Residential Mixed (RM), with the existing building remaining.

## FINDINGS:

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1. The adopted Future Land Use Map shows the future land use designation of the property as being Mixed Use 1.
2. The subject property is about 1.07 acres with one 3 story residential building.
3. Property was rezoned from the R-2-6.5 and R-2-10 Zone to the RM Zone in 1995.
4. Along with the rezone, the property received a Conditional Use Permit for a Residential Health Care Facility in 1995.

5. As part of the rezone approval, a zoning condition was placed on the property requiring residence of the facility to be 62 years of age or older.
6. The property and use met the requirements for the use and zone at the time of construction.
7. In the 1995 Zoning Ordinance, the parking ratio for a Residential Health Care Facility was 4 spaces plus 1 space per five beds. The facility was approved for 75 units, making the required parking at the time 19 parking spaces.
8. The proposed and approved preliminary plans had 38 parking spaces on site. While the final site plan approval for the conditional use only had 35 parking spaces.
9. Off-street parking is not readily available at this location. 3900 South is a five-lane arterial, with no shoulder along the property frontage. 775 E is a relatively narrow residential street, measured at 30 feet from curb to curb.
10. The property was operated as a residential care facility until 2023.
11. The property was converted to a 55+ apartment building in 2023, but no land use approval was sought, and no business license was applied for.
12. Under the current Millcreek Zoning Code, the Parking and Mobility Standards chapter requires 0.5 spaces per unit for senior (55+) housing. ([MKZ 18.63.020.C](#))
13. The property owners reduced the units to bring the total down to 70 units from 75 units, which would require a minimum of 35 parking spaces to meet parking requirements.
14. The existing parking lot has 32 parking spaces; the applicant has proposed that by re-stripping the parking lot they can achieve the required 35 parking spaces.
15. Multiple-household dwellings with more than 25 units are listed as a conditional use permit under [MKZ 18.39.030](#).
16. Millcreek has received many complaints and concerns from the property owners and residents who live on 775 E regarding the tenants and employees of the facility parking along 775 E due to insufficient parking spaces onsite making access to their properties difficult for residents, mail, and garbage.
17. The Unified Fire Authority has expressed concerns about accessing both the subject property and all the properties located on 775 E due to the excessive parking in their lot and along 775 E making it difficult for their emergency vehicles to fit down the road.

Street view imagery from July 2025 indicates the significant use of off-street parking along the property's 775 E frontage:





The following street view imagery was taken on November 25, 2025, at 11:00am showing 775 E:





The following image is of the subject property's parking lot taken at the same time as the previous street images:



## CONCLUSIONS:

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1. The proposed removal of the zoning condition will allow the property to be operated as a multiple-household dwelling rather than an assisted living facility.
2. The zoning condition removal would not change the adopted Future Land Use Map which shows the land use designation as Mixed Use 1.
3. The zoning condition removal would formally expand access to moderate income senior housing, a goal supported by the Millcreek General Plan.
4. The most recent site plan submitted to the Planning Department shows the property would meet the minimum parking space requirements by re-striping the existing parking lot.
5. There are access and mobility concerns along 775 E that have come about due to the overflow of parking from the subject property.
6. The applicant's proposal to restripe the parking lot is insufficient to meet the parking demand, given observed overflow parking on a narrow residential road. Additional off-street parking is warranted given the current occupancy.

## PLANNING STAFF RECOMMENDATIONS

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Staff recommends that the Planning Commission take public comments and make a recommendation to the City Council in favor of removing the zoning condition on the property located at 777 E 3900 S subject to the following condition:

- The applicant shall have at least 38 parking spaces onsite.
- The applicant shall work with Millcreek's Public Works Department and Unified Fire Authority to paint no parking areas and post no parking signage along the subject property's frontage to protect and maintain access to the property's parking lot and nearby fire hydrants.

Staff suggests alternative recommendations that could address concerns regarding overflow parking:

- Recommendation against the removal of the zoning condition.
- Recommendation to limit the unit count to 64 units, and no re-striping or additional parking would be required.
- Parking shall not be sold separately from the lease.
- Alter the existing zoning condition to limit the use of the property to 55+ senior living.

### **Millcreek Community Council:**

On Dec 2<sup>nd</sup>, 2025, Millcreek Community Council held a meeting to review, discuss, and take public comment pertaining to the proposal and made a unanimous recommendation against the proposal to remove the zoning condition on the subject property. The Council was in agreement that at this time there was not a sufficient parking plan in place to address the parking issues that have been created due to the property being converted from an assisted living facility to a 55+ senior living facility.

## SUPPORTING DOCUMENTS

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- Aerial Map
- Zoning Map
- Land Use Map
- Letter of Intent
- Applicant's parking lot re-striping plan
- County Planning Commission meeting minutes from 1995
- Additional County approval documents from 1995
- Preliminary Site Plan
- Approved Site Plan
- Email from Shirl White, Unified Fire Marshal regarding parking and access concerns.
- Aerial imagery over the last few years showing the street parking on 775 E.



Aerial Map





Zoning Map



Land Use Map



**Jack Straw**  
Director of Planning and Entitlements  
Pacifica Companies  
jstraw@pacificacompanies.com  
619-889-0583



**Date:** 6/16/2025

**City of Millcreek**  
Planning and Zoning Department  
3330 South 1300 East  
Millcreek, UT 84106

**Re: Letter of Intent for Zoning Condition Removal — 777 E 3900 S, Millcreek, UT (The Laurel)**

Dear Millcreek City Planning Commission,

On behalf of Pacifica Companies, I am submitting this Letter of Intent in support of our application to remove the existing zoning condition tied to the property at 777 E 3900 S, Millcreek, currently zoned R-M/zc. The current condition restricts occupancy to individuals aged 62 and older.

We are requesting the removal of this condition to allow for a broader senior housing model. Following this change, we plan to seek a Conditional Use Permit to operate the project as a 55+ age-restricted community, consistent with the Housing for Older Persons Act (HOPA).

This adjustment will better align with market needs while preserving the original intent of providing quality housing for older adults. The Laurel will continue to enhance the neighborhood and contribute to Millcreek's goals for housing diversity and livability.

Thank you for your consideration. Please contact me with any questions or if additional information is needed.

Sincerely,  
Preston Reading  
Project Manager  
Navigate CM & Development

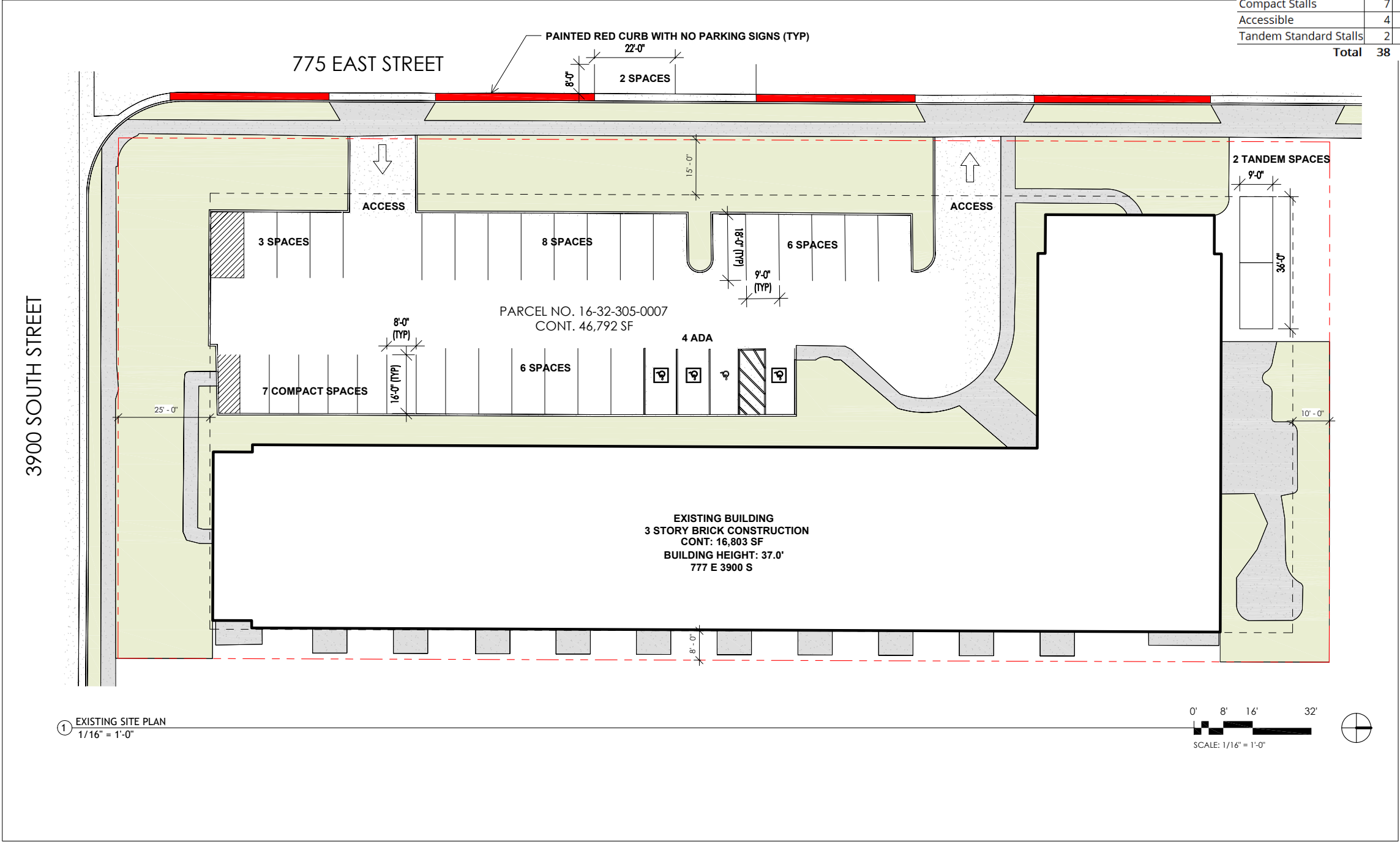
[preston@nvgte.com](mailto:preston@nvgte.com)

801-574-4965

PARKING CALCULATION

Required Parking			
Residential Use	Min. Required	Total Units	Parking Req'd
Senior (55+ Housing)	0.5 spaces per unit	70 <sup>1</sup>	35
1 - The complex initially had 74 total units. However, one is a model with furniture that is not leased and three are used as administration and			

Proposed Parking		
Stall Type	QTY	Notes
Standard Stalls	23	9' x 18'
Off Site Parking	2	8' X 22'
Compact Stalls	7	8' x 16' (20% of total stalls required)
Accessible	4	Two standard and two van accessible
Tandem Standard Stalls	2	9' x 18'
Total		38





**SALT LAKE COUNTY PLANNING COMMISSION  
JULY 25, 1995**

associated with the golf course are requested.

**By motion seconded, the Planning Commission approved this application subject to staff recommendations.**

**GENERAL PLAN AMENDMENT - DECISION**

**PL-95-0004 - SALT LAKE COUNTY PLANNING COMMISSION - SIGMA CORPORATION - AMENDMENT TO THE MILLCREEK GENERAL PLAN TO SHOW PROPERTY LOCATED AT 777 E. 3900 S. AS HIGH DENSITY RESIDENTIAL**

Tom Roach - The applicants request is to change the medium density designation on the adopted Millcreek Community Land Use Plan to a high density designation for the 1.07 acre property. The proposal is to construct a 75 unit elderly residential facility.

The General Plan text supports high density development at this location, if, the development design creates a compatible arrangement with the row of duplex dwellings that exist along 755 East.

With the information that has been presented and reviewed the staff is confident that a quality development will be constructed that is compatible with surrounding uses and creates a desirable transition that will protect the duplex subdivision along 777 East. Planning staff recommends approval of application PL-95-0004 amending the Millcreek Community General Plan to show properties at this location as high density residential. Staff also recommends approval of PL-95-4047, rezoning to R-M.

Catherine Platt - Planning Commission Vice Chairman - What is the difference between a change in the General Plan and the Master Plan?

Tom Roach - A General Plan is the current language that we are using. It is no longer considered a Master Plan.

Bill Marsh - They are both basically the same. The terminology that is used in the State law is the General Plan. So staff has started to use that terminology. There is no difference in the process.

Catherine Platt - Planning Commission Vice Chairman - If this is a process that is going to take place starting with our action today, should we rezone it right away?

Tom Roach - You will have your decision on the rezoning application today also.

Bill Marsh - When you get down to that application staff has recommended approval subject to the approval of the General Plan change.

David Brems - Planning Commission Chairman - That plan change will be finalized by the County Commission.

Bill Marsh - Yes, there is a hearing process that it has to go through. We normally try to take them to the County Commission at the same time.

Catherine Platt - Planning Commission Vice Chairman - So that is the point of having them all together.

John Young - It helps expedite the application.

**By motion seconded, the Planning Commission approved this application as outlined by staff.**

**PL-95-4047 - SIGMA CORPORATION - 777 E. 3900 S. - FROM R-2-10 & R-2-6.5 TO R-M ZONE - 1.1 ACRES - MILLCREEK**

The Planning Division staff recommends the application be approved as it is compatible with the master plan if amended.

Staff recommends approval subject to the master plan amendment being approved by the County Commission.

**By motion seconded, the Planning Commission approved this application as outlined by staff. Thereby being subject to final approval by the County Commission of the General Plan change.**

**ZONING DECISION - NO ADDITIONAL TESTIMONY IS ALLOWED EXCEPT AS REQUESTED BY A PLANNING**

**SALT LAKE COUNTY PLANNING COMMISSION  
JULY 25, 1995**

4. Submit three copies of building elevations to the staff for review and final approval.
5. Install curb, gutter and sidewalk on all public streets.
6. No signs are approved with this request, they require separate approval.
7. Install a 6' high solid visual barrier wood fence or masonry wall around the periphery of the property excluding the front yard setback.
8. Review upon complaint.
9. Finalization of the rezoning (PL-95-4051) to C-2.

**By motion seconded, the Planning Commission approved this application subject to staff recommendations.**

**PL-95-2141 - THE BEEHIVE HOUSE - 1142 & 1166 E. MURRAY-HOLLADAY RD. (4780 S.) - ELDERLY APARTMENTS (65 YEARS & OLDER) - R-M ZONE - SO COTT**

John Young - This application was continued from the last meeting to allow the applicant time to meet with the Community Council. The site plan submitted with the application did not allow for the widening of Murray-Holladay Road. The applicant in the meeting indicated he has a new site plan, but has not submitted it to staff for review. The site plan in the file does not work.

Staff recommends the application be continued to 8/8/95, to allow time for the new site plan to be submitted.

NOTE: Staff has received a new site plan and hopes to have time to review it before the meeting. If it works, it could be approved subject to the following:

1. Meet with the staff for review and final approval of the site plan.
2. Receive and agree to the recommendations from other agencies, i.e.; Fire Department, City-County Health Dept., Urban Hydrology, Transportation Engineer, etc.
3. Dedication of 40' from center line of Murray-Holladay Road to Salt Lake County for street right-of-way.
4. Submit three copies of a planting and sprinkling plan showing types, sizes and placement of plant material to the staff for review and approval.
5. Submit three copies of building elevations to the staff for review and final approval.
6. Install curb, gutter and sidewalk on all public streets.
7. Install a 6' high solid visual barrier wood fence or masonry wall around the periphery of the property excluding the front yard setback.
8. Finalization of the rezoning.

Tracy Stocking - This falls between a traditional apartment building and a nursing home. There really is no defined use for this with a related parking requirement. Based on existing similar uses in Salt Lake City and County the ratio for parking seems to be one parking stall for every two apartments. That is also the ratio that H.U.D. uses for elderly housing. We feel like the 20 stalls we've asked for is appropriate and can accommodate the use of the building.

David Brems - Planning Commission Chairman - There is a new ordinance that is in progress right now which requires one parking space per unit in an elderly housing apartment complex such as this. You are going to need to meet that requirement, wait for us to approve that or you are going to need to go to the Board of Adjustment. We can not waive that parking requirement for your here today.

Tom Halladay - Millcreek Community Council - Submitted a letter in support of this project based upon the parking issue being taken care of. There is also a home out in front. We are not sure what is going to happen to that, but the property line is 1' away from the wall.

**By motion seconded, the Planning Commission approved this application subject to staff recommendations. Adding 9, that any reduction in the parking is subject to Board of Adjustment approval. Adding 10, residents must be 62 years and older as this has been proposed as an elderly housing project.**

**PL-95-2149 - SIGMA CORP. - 777 E. 3900 S. - RESIDENTIAL HEALTH CARE FACILITY - R-2-10 & R-2-6.5 ZONE - MILLCREEK**

John Young - The applicant is proposing a residential health care facility with 75 apartments and 38 parking spaces. Access is by two driveways from 775 East. There is no access from the property to 3900 South. The building is a three story structure and has an 8' side yard on the east. The property to the north & west has been developed with duplexes on a 50' residential street. The proposed building will be very intense at this location.

**SALT LAKE COUNTY PLANNING COMMISSION**  
**JULY 25, 1995**

Staff recommends the application be continued to 8/8/95, to allow the applicant time to submit a new site plan that increases the east side yard to at least 15', reduces at least a portion of the building to two stories and shows additional green space for the residents to use.

Hal Hansen - Sigma Corporation - We have redesigned the site plan in accordance with one of the requirements that Bill Marsh gave use a few weeks ago. Moving the ingress into the property back from 40' to 60' from the corner in accordance with the code. We were able to increase the green space by 300 sq.ft.

Steven Fetter - Representing the Lunds - They own four duplex units directly to the north of this property. We do not have any objections to the elevation of this project. We don't have any objections to either the height or the setbacks as stipulated by the applicant.

Steve Hansen - Sigma Corporation - Approximately 50% of the main level is dedicated to common area for dining and recreation. The majority of the dwelling units will be on the upper floors.

**By motion seconded, the Planning Commission approved this application subject to staff recommendations. This approval is contingent upon the Board of Adjustment approval of regarding the parking, if required. The minimum age of the residents to be 62 years old.**

**PL-95-2152 - HORMAN CONSTRUCTION - 3673-3711 S. 900 E. - MULTI-FAMILY HOUSING - C-2 ZONE - MILLCREEK**

The applicant proposes a high density residential project of 120 units in 10 buildings. The density is approximately 24.75 units per acre. The site plan shows no landscaping between the street and the parking areas and includes the public right-of-way within the boundary of the site. The density of this project should be reduced to approximately 20 units per acre and the plan redesigned to allow the buildings and open space to relate to each other rather than isolating the buildings from each other and from the green area.

Staff recommends the application be continued to 8/8/95, to allow the applicant time to submit a new site plan.

**By motion seconded, the Planning Commission continued this application to the meeting of August 8, 1995.**

**PL-95-2153 - ALEXANDER C. & VANAE E. MORRIS - 7199 S. 2700 E. - PRIVATE EDUCATIONAL INSTITUTION (30 STUDENTS PER SESSION) R-1-8 ZONE - COTT HTS**

David Brems - Planning Commission Chairman - Left the meeting before this item was concluded.

John Young - This application was continued from the last meeting to allow the applicant time to meet with the community to try to resolve the neighbor's concerns. This school is proposed to be operated in a non-standard method with students & staff arriving & leaving throughout the day. The applicant has met with the Traffic Engineer to resolve those issues. The number of students has been reduced from 60 to 30 and the applicant has agreed to transport at least 18 of those students.

If the Planning Commission determines this is an appropriate use, staff recommends the following conditions:

1. Meet with the staff for review and final approval of the site plan.
2. Receive and agree to the recommendations from other agencies, i.e.; Fire Department, City-County Health Dept., Urban Hydrology, Transportation Engineer, etc.
3. Submit three copies of a planting and sprinkling plan showing types, sizes and placement of plant material to the staff for review and approval.
4. No signs are approved with this request, they require separate approval.
5. Maximum number of students to be 30.
6. Transport by van at least 18 of the 30 students, more if possible.
7. **No parking allowed on 2700 East.**
8. Curb, gutter and sidewalk to be constructed on 2700 East.
9. Driveway to be designated "one way." The southernmost driveway to be for entry and the northernmost driveway to be for exit.
10. Comply with all roadway standards.
11. Install a 6' high solid visual barrier wood fence or masonry wall along the northeast & south property lines.

Vanae Morris - 7216 S. 2825 E. - We did meet with the neighbors. We answered their questions. We've talked with the agencies that have made recommendations to Development Services staff. All of which have recommended

Final Approval Letter

December 19, 1995

HAL HANSEN  
SIGMA CORPORATION  
2090 E. RAINBOW POINTE, SUITE 200  
SLC UT 84124-1721

FILE COPY



Salt Lake County  
Public Works  
Department

Development Services  
Division

RE PL-95-2149 - A RESIDENTIAL HEALTH CARE FACILITY (77 UNITS) AT 777 E. 3900 S.  
APPROVAL DATE: AUGUST 22, 1995

**THIS LETTER AND THE ENCLOSED APPROVED SITE PLAN CONSTITUTE THE CONDITIONAL USE PERMIT AND APPROVAL FOR YOUR APPLICATION.** All improvements which are required by the Salt Lake County Zoning Ordinance or Planning Commission action must be installed or bonded for, prior to the final electrical inspection approval by the Building Inspector (power to panel), or if no electrical inspection is required, prior to the issuance of any Occupancy Permit for the land being developed, or commencement of the approved Conditional Use.

Randy Horiuchi  
Salt Lake County  
Commissioner

Lonnie L. Johnson  
Director of Public Works

Ken Jones  
Division Director

Following is a list of improvements and conditions required by this approval:

1. All areas not approved for structures, parking, access or other construction which occupies space on the land must be landscaped with live-plant material and sprinkler system. Landscaped areas shall be maintained.
2. Highback curb, gutter and sidewalk must be installed along the property lines which abut any public road or street, and are subject to approval by Engineering Services, 468-2448.
3. All parking areas and access drives must be hard surfaced with asphalt or concrete, and graded and drained to dispose of surface water as approved by Engineering Services.
4. Parking areas and/or access drives adjacent to residential uses or zones must be screened with a six-foot high solid visual masonry or wood barrier. Development Services may determine the type of visual barrier to be used.
5. Provisions must be made to prevent automobiles or other vehicles from coming into contact with fences or walls.
6. Any lighting on the property must be installed so as to deflect light away from residential uses.
7. The following additional conditions are required by the Planning Commission:
  - A. Agree to the recommendations from other agencies, i.e.; Fire Department, City-County Health Dept., Urban Hydrology, Transportation Engineer, etc.
  - B. Submit three copies of a planting and sprinkling plan showing types, sizes and placement of plant material to the staff for review and approval by February 1, 1996.
  - C. Residents must be 62 years of age or older.

SALT LAKE COUNTY  
GOVERNMENT CENTER  
2001 S. State Street  
Suite N3600  
Salt Lake City  
Utah 84190-4050  
Tel (801) 468-2000  
TDD (801) 468-2877  
Fax (801) 468-2169  
*Printed on Recycled Paper*

Any business operating at these premises must obtain a business license.

Sincerely,

J. Warren Reynolds  
Planner

JWR/jr

cc: Fire Department  
Development Engineering  
Business License  
Urban Hydrology



Preliminary Approval Letter

July 26, 1995

HAL HANSEN  
SIGMA CORPORATION  
2090 E. RAINBOW POINTE, SUITE 200  
SLC UT 84124-1721

RE: PL-95-2149 - A RESIDENTIAL HEALTH CARE FACILITY (72 UNITS)  
AT 777 EAST 3900 SOUTH

THIS IS NOT A CONDITIONAL USE PERMIT. Upon completion of the following conditions you will receive the conditional use permit which consists of a letter of final approval with an approved site plan.

On July 25, 1995, the Salt Lake County Planning Commission granted preliminary approval of your request, subject to the following conditions:

1. Meet with the staff for review and final approval of the site plan.
2. Receive and agree to the recommendations from other agencies, i.e.; Fire Department, City-County Health Dept., Urban Hydrology, Transportation Engineer, etc.
3. Any dedication that may be needed on 3900 South for street widening is subject to the County Transportation Engineer's recommendation.
4. Submit three copies of a planting and sprinkling plan showing types, sizes and placement of plant material to the staff for review and approval.
5. Submit three copies of building elevations to the staff for review and final approval.
6. Install curb, gutter and sidewalk on all public streets at the new and correct alignment.
7. Install a 6' high solid visual barrier wood fence or masonry wall along the north and east property lines.
8. Finalization of the rezoning and approval of the master plan amendment by the County Commission.
9. Board of Adjustment approval for parking if required. **Note:** (19 parking spaces are required. 38 have been provided. Board of Adjustment approval is not required.)
- 10 Residents must be 62 years of age or older.

Note: You must obtain the final conditional use and a building permit within 24 months of the date of the Planning Commission action or this approval will expire.



Salt Lake County  
Public Works  
Department

Development Services  
Division

Randy Horiuchi  
Salt Lake County  
Commissioner

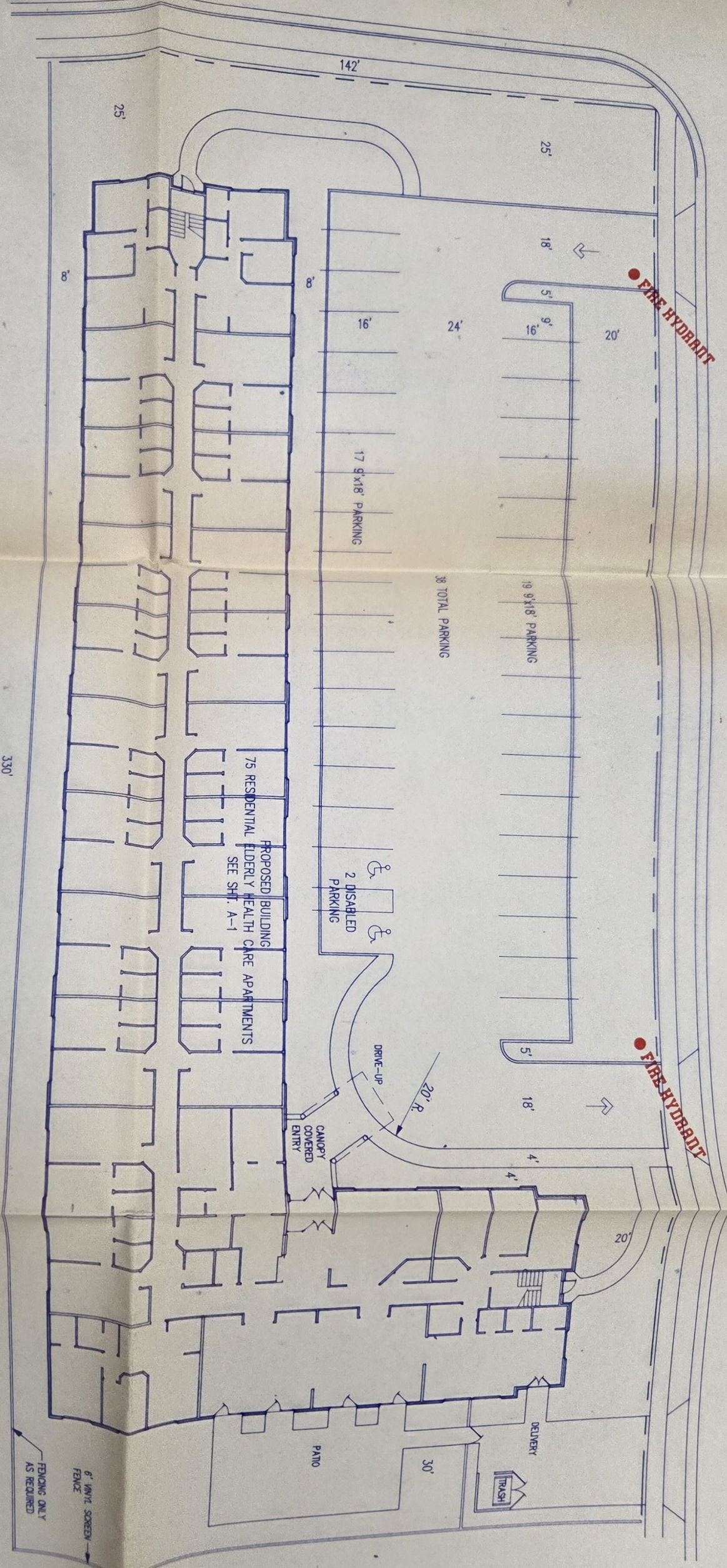
Lonnie L. Johnson  
Director of Public Works

Ken Jones  
Division Director

SALT LAKE COUNTY  
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2001 S. State Street  
Suite N3600  
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TDD (801) 468-2877  
Fax (801) 468-2169  
*Printed on Recycled Paper*



7 7 5 E A S T  
EXISTING FIRE HYDRANT



PRELIMINARY SITE PLAN  
SCALE: 1/16" = 1'-0"



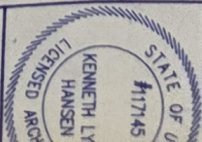
**APPROVED**  
WITH CONDITIONS STATED BELOW

*Two (2)* Hydrants required. Fire hydrants to be located 25' indicated on approved plans. Combustible construction will not be allowed until hydrants and water systems are installed and operational. Timing of installation. Fire Protection facilities are to be installed by the developer. Such facilities including all surface access roads shall be installed and made serviceable prior to and during the time of construction. U.F.C. 10.301  
NEEDED FIRE FLOW IS 3000 GPM.  
SALT LAKE COUNTY FIRE DEPARTMENT  
DON R. BEHN, CHIEF  
*Don R. Behn*  
6-19-1995

By: *Stacy Corp*  
Date: *6-19-1995*  
I acknowledge the above stated requirements.  
Shall give Fire Department an Engineering Analysis of the water system and verification of the fire flow and flow tests required previous to starting construction.

PRELIMINARY SITE PLAN  
ELDERLY RESIDENTIAL

CONTRACTOR & SUBS TO VERIFY THEY HAVE LATEST PLANS & SPECS PRIOR TO CONSTRUCTION.  
THESE DRAWINGS & DESIGNS ARE THE PROPERTY OF KENNETH LYNN HANSEN ARCHITECT & MAY NOT BE REPRODUCED OR COPIED IN ANY MANNER WITHOUT THE WRITTEN CONSENT OF KENNETH LYNN HANSEN ARCHITECT.



KENNETH LYNN HANSEN  
ARCHITECT



# Mill Creek Retirement Community

## GENERAL NOTES:

1. ALL WORK SHALL COMPLY STRICTLY WITH THE CURRENT BUILDING CODE, STATE AND ALL CITY AND LOCAL ORDERS & ORDINANCES.
2. ALL DIMENSIONS ARE TO FACE OF CONCRETE, MASONRY OR STUD FRAMES UNLESS NOTED OTHERWISE.
3. FINISHES ARE TO BE SEENED, ANY DIMENSIONAL DISCREPANCIES SHALL BE CARED WITH THE ARCHITECT.
4. CONTRACTOR SHALL VERIFY ALL IMPOSED LIMITATIONS OF ANY UNUSUAL GEOLOGICAL CONDITIONS DISCOVERED DURING EXCAVATION.
5. CONTRACTOR SHALL VERIFY ALL DIMENSIONS AND SITE CONDITIONS AND SHALL REPORT ANY DISCREPANCIES TO THE ARCHITECT PRIOR TO BEGINNING WORK. CONTRACTOR SHALL OBTAIN WRITTEN ACCEPTANCE OF ANY CONDITIONS.
6. CONTRACTOR SHALL VERIFY THE LOCATION AND SHALL REPORT ANY DISCREPANCIES TO THE ARCHITECT PRIOR TO BEGINNING WORK. CONTRACTOR SHALL VERIFY THE DEPTHS, CONTRACTOR SHALL VERIFY UTILITY LOCATIONS IMMEDIATELY OF ANY PROXIMAL OR POTENTIAL PROBLEMS WITH UTILITIES.
7. CONTRACTOR OR SUB-CONTRACTORS SHALL VERIFY THAT THEY HAVE THE LATEST EDITION OF THE PLANS BEFORE PROCEEDING WITH THEIR PORTION OF THE WORK.
8. MECHANICAL & ELECTRICAL SUB-CONTRACTORS ARE TO ON A TENSOR-SHALL BLISS WITH THE LAYOUTS ON SOME OF THE ARCHITECTURAL PLANS IS REFERENCE.
9. DIMENSIONS SHOWN ON ARCHITECTURAL SITE PLAN ARE APPLICABLE. SEE CITY ENGINEERING DEPARTMENT FOR UTILITY, ACCURATE SITE & BUILDING LAYOUT.

## BUILDING CODE INFORMATION:

BASED ON THE 1994 EDITION OF THE NATIONAL BUILDING CODE

OCCUPANT GROUP - R-1, APARTMENT HOUSES

CONSTRUCTION TYPE - TYPE V, HOAR BATED

ALLOWABLE SQUARE FOOTAGE:

10,500 SQ. FT.  $\times 2$  (FOR MULTI STORIES) = 21,000 SQ. FT.

INCREASE FOR STORIES - 2  $\times$  21,000 = 42,000 SQ. FT.

MODIFIER FOR SEPARATION ON TWO SIDES - 1.25  $\times 42$  = 52,500 SQ. FT. ACTUAL

TOTAL ALLOWABLE SQ. FT. = 42,000 + 51,000 = 93,000 SQ. FT.

ACTUAL SQUARE FOOTAGE

13,500 SQ. FT. HO LEVEL + 3 LEVELS = 44,510 SQ. FT.

ALLOWABLE BUILDING HEIGHT - 3 STORIES

ACTUAL BUILDING HEIGHT - 3 STORIES

UNIT SEPARATION: ALL LIVING UNITS ARE SEPARATED FROM EACH OTHER BY ONE HOAR OR RESISTIVE PARTY WALL & FLOOR/CEILING ASSEMBLIES.

CORRIDORS ARE OF ONE HOAR RATED CONSTRUCTION WITH 20 MINUTE RATED OVERDOORS.

STAIRWAYS & ELEVATOR SHAFT ARE OF ONE HOAR RATED CONSTRUCTION WITH 1 HOAR RATED OVERDOORS.

DISABLED ACCESSIBILITY REQUIRED: PER THE 1994 EDITION OF THE NATIONAL BUILDING CODE, 2% OF THE LIVING UNITS AND ALL MENA AREAS MUST BE ACCESSIBLE. 2  $\times$  7 = 2 ACCESSIBLE UNITS

DISABLED ACCESSIBILITY PROVIDED: ALL AREAS OF THE BUILDING ARE ACCESSIBLE & 7 LIVING UNITS ARE ACCESSIBLE/ADAPTABLE.

ARCHITECTURAL SITE PLAN  
SCALE: 1/16" = 1'-0" 21 UNITS THIS LEVEL

SCALE: 1/16" = 1'-0"

21 UNITS THIS LEVEL

## BUILDING SQ. FT. &amp; % DATA:

	UNIT APTS.					
	UNIT A -	475 SQ. FT., ONE BEDROOM,	ONE BATH -	68 UNITS =	27,550 SQ. FT.	
	UNIT B -	652 SQ. FT., TWO BEDROOM,	ONE BATH -	10 UNITS =	6,520 SQ. FT.	
	UNIT C -	510 SQ. FT., ONE BEDROOM,	ONE BATH -	4 UNITS =	2,040 SQ. FT.	
	UNIT D -	794 SQ. FT., TWO BEDROOM,	ONE BATH -	3 UNITS =	2,112 SQ. FT.	
	UNIT E -	315 SQ. FT., STUDIO,	ONE BATH -	2 UNITS =	630 SQ. FT.	
	784 SQ. FT. OF BUILDING SQ. FT.	TOTAL -	77 UNITS =	38,852 SQ. FT.		
	COMMON ACTIVITY & MANAGEMENT AREA -	654 S.F. OF BUILDING =	4,238 SQ. FT.			
	CORRIDORS, STAIRS & ELEVATOR AREA -	1300 S.Q. OF BUILDING =	6,720 SQ. FT.			
	TOTAL BUILDING AREA =	49,316 SQ. FT.				

## INDEX OF DRAWINGS

[illegible]

SITE PLAN & TITLE SHEET

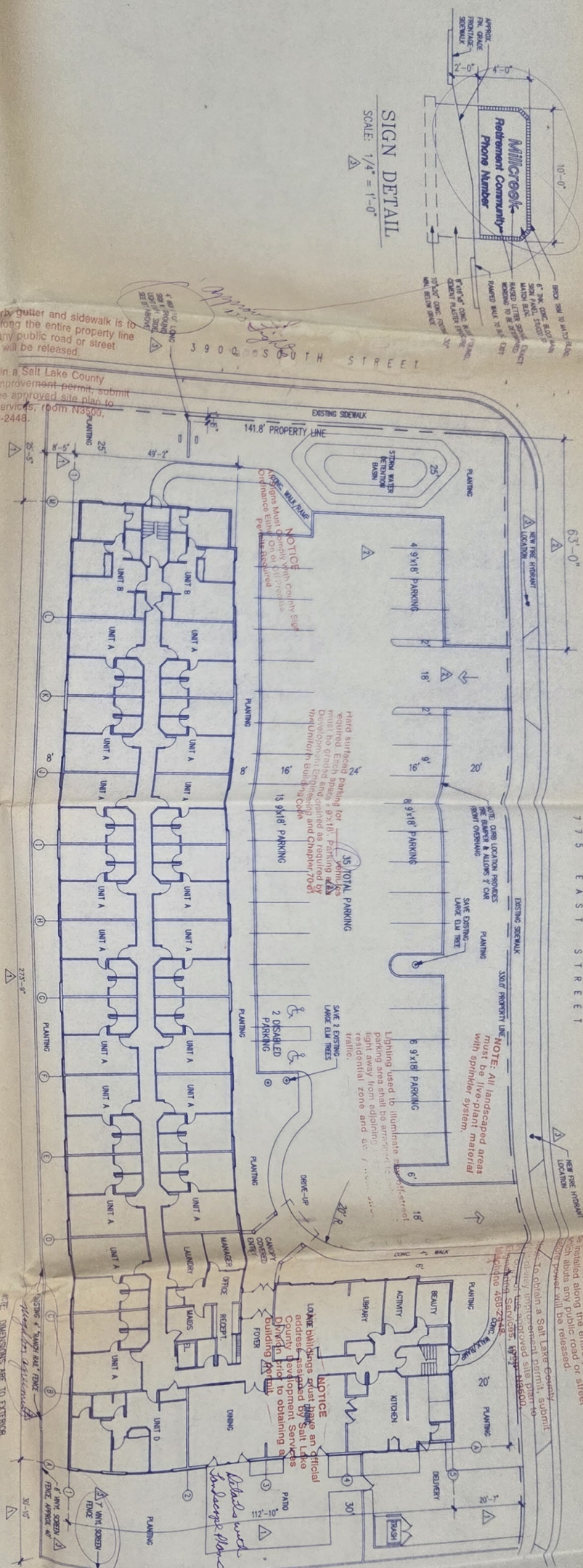
MILLCREEK RETIREMENT COMMUNITY  
777 EAST 3900 SOUTH, SALT LAKE COUNTY, UTAH  
AN ELDERLY RESIDENTIAL CARE FACILITY BY THE SIGMA CORPORATION

CONTRACTOR & SUBS TO VERIFY  
THEY HAVE LATEST PLANS &  
SPECS PRIOR TO CONSTRUCTION

THESE DRAWINGS & DESIGNS ARE  
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KENNETH LYNN HANSEN  
ARCHITECT

7180 SOUTH 2300 EAST, SALT LAKE CITY, UTAH 84121 (801) 944-9000



**NOTICE - VERY IMPORTANT**

All improvements required by ordinance or Planning Commission action must be installed (or a bond submitted to the County to assure installation at a later time) prior to release of power-to-panel, occupancy of any building, or commencement of approved uses.

**NOTICE - VERY IMPORTANT**

**GEOTECHNICAL AND SOILS REPORTS**  
Approval based on compliance with the  
recommendations contained in the  
geotechnical and soil reports.

This development plan is approved by the  
Soil Latex County Planning Commission  
subject to the following conditions as shown this  
plan and based on the approval of \_\_\_\_\_  
[Signature]  
\_\_\_\_\_  
Date 2-27-99

Printed Name of Approver \_\_\_\_\_  
Title \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
Comments \_\_\_\_\_  
92-2149

FILE COPY

DUPLICATE  
DUE \$ 25

NOTE: DIMENSIONS ARE TO EXTERIOR FACE OF STUD. ADD 5" ALL AROUND TO FACE OF BRICK.

6 FOOT HIGH SOLID  
VISUAL BARRIER:  
☐ WOODEN FENCE  
☐ MASONRY WALL  
☐ CONCRETE WALL



---

RE: [Ext] ZT-25-004 - The Laurel - 777 E 3900 S

---

From Shirl White <swhite@unifiedfireut.gov>  
Date Tue 11/25/2025 8:33 AM  
To Zackery Wendel <zwendel@millcreekut.gov>

Thanks Zack,

Yes, the problem that has been created with the change to apartments has been excessive parking in their lot and on the street. This creates access problems in both areas. The street (775 East) is not wide enough for the parking that has taken place. Additional parking should be acquired in another location rather than in these areas.

Thank you... much appreciated.



Shirl White  
Fire Inspector  
Unified Fire Authority  
4965 South Redwood Rd.  
Taylorsville, Utah 84123  
Phone: 801-824-3717  
swhite@unifiedfire.org



---

**From:** Zackery Wendel <zwendel@millcreekut.gov>  
**Sent:** Monday, November 24, 2025 4:07 PM  
**To:** Shirl White <swhite@unifiedfireut.gov>  
**Cc:** Trudi Hawes <thawes@millcreekut.gov>  
**Subject:** Re: ZT-25-004 - The Laurel - 777 E 3900 S

**CAUTION:** This email originated from outside of the UFA organization. Do not click links, open attachments or take actions indicated unless you confirm the sender and know the content is safe. - UFA IT Support.

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders. Contact UFA IT support.

Hey Shirl,

I am currently writing my staff report for the Laurel and wanted to know what concerns and issues you have for the property. I know that in the past there were discussions on the parking situation at the Laurel that made it difficult for emergency services.

Let me know what you think and if there is anything you would like me to add to the report.



---

**RE: [Ext] Access and Egress Issues The Laurel at Millcreek**

---

**From** Stephen Rowbottom <srowbottom@millcreekut.gov>

**Date** Tue 12/9/2025 11:30 AM

**To** Shirl White <swhite@unifiedfireut.gov>; banderton@unifiedfireut.gov <banderton@unifiedfireut.gov>; kmillard@unifiedfireut.gov <kmillard@unifiedfireut.gov>; Wwatkins@unifiedfireut.gov <Wwatkins@unifiedfireut.gov>; SGray@unifiedfireut.gov <SGray@unifiedfireut.gov>; Zackery Wendel <zwendel@millcreekut.gov>; Planner <planner@millcreekut.gov>; Francis Lilly <flilly@millcreekut.gov>

**Cc** Chance Peck <cpeck@millcreekut.gov>; Dustin Eberspacher <deberspacher@millcreekut.gov>; Thom Desirant <tdesirant@millcreekut.gov>

Hi Shirl,

I am including Millcreek Planning and Zoning Department on this email. They are currently working with The Laurel on a revised parking plan and zoning issues. The Laurel is scheduled for a Planning Commission meeting on December 17<sup>th</sup> and a City Council meeting on January 12<sup>th</sup>. Planning is compiling their staff report for the meetings. If you have specific requests, comments, or items that you would like to add please respond to everyone in this email.

Thanks

**Steve Rowbottom**  
**Business License Inspector**

Office: 801-214-2716

Cell: 801-688-8602

Millcreekut.gov



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**From:** Shirl White <swhite@unifiedfireut.gov>

**Sent:** Tuesday, December 9, 2025 6:13 AM

**To:** Dustin Eberspacher <deberspacher@millcreekut.gov>

**Cc:** Brian Anderton <banderton@unifiedfireut.gov>; Kelly Millard <kmillard@unifiedfireut.gov>; Wade T. Watkins <Wwatkins@unifiedfireut.gov>; Stewart Gray <SGray@unifiedfireut.gov>

**Subject:** RE: [Ext] Access and Egress Issues

Good Morning Dustin,

The email below was sent by UFA Captain Millard. It is my understanding that the Laurel has submitted a parking plan to the City that hopefully addresses the issues long term. In the meantime is there anything that can be done now to help resolve fire access concerns for our emergency responders at this location.

Thank you.

Respectfully,



Shirl White  
Fire Inspector  
Unified Fire Authority  
4965 South Redwood Rd.  
Taylorsville, Utah 84123  
Phone: 801-824-3717  
swhite@unifiedfire.org



---

**From:** Kelly Millard <[kmillard@unifiedfireut.gov](mailto:kmillard@unifiedfireut.gov)>  
**Sent:** Friday, December 5, 2025 6:34 PM  
**To:** Shirl White <[swhite@unifiedfireut.gov](mailto:swhite@unifiedfireut.gov)>  
**Cc:** Brian Anderton <[banderton@unifiedfireut.gov](mailto:banderton@unifiedfireut.gov)>  
**Subject:** Access and Egress Issues

Shirl,

We respond to 777 East 3900 South (The Laurel at Millcreek Apartments) complex often. We are having issues getting our Engine in and out of the complex due to the parking on 775 East. Vehicles are parked close to the corner of 3900 South and on the corners of the two entrances to the complex. There are times we have to park on 775 East and just block the whole road while we are on a call. is there anything we can do in this area to make sure there is enough clearance to get in and out of the complex? Let me know if I can do anything to help get this accomplished.

Thanks,

Kelly Millard, Captain

Unified Fire Authority

Station 101C

[kmillard@unifiedfireut.gov](mailto:kmillard@unifiedfireut.gov)

801-554-4839



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GP-25-003

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## Staff Report

**Date:** December 17, 2025

**Applicant:** Millcreek

**Re:** Addition of a Water Preservation Element to the General Plan

**Prepared By:** Sean Murray

**Scope of Decision:** **Discretionary.** This is a legislative matter, to be decided by the Millcreek City Council upon receiving a recommendation from the Community Council(s) and the Millcreek Planning Commission. Your recommendation can be broad in scope, but should consider prior adopted policies, especially the Millcreek General Plan.

## REQUEST AND SYNOPSIS

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In 2022, the Utah legislature adopted [Senate Bill 110](#) which requires all municipalities and counties in Utah to update their general plans to include a Water Preservation Element that outlines water consumption and preservation. The goal of this bill is to gain a better understanding of how water is used within a municipality and what can be done to reduce consumption over the coming decades.

Millcreek partnered with Bowen Collins & Associates, a water focused civil engineering firm, to help gather data and draft elements of the plan. This partnership was essential in collecting data from the multiple water providers within Millcreek. Since Millcreek does not manage its own water utility, staff had to collect data from the numerous providers and extrapolate their data for the Millcreek service area. With this data, staff could estimate how much water is currently used within Millcreek and how much preservation of water usage will be necessary as our population grows. This data, as well as preservation benchmarks and strategies, are outlined in detail in the attached draft preservation element at the end of this memo.

## CURRENT WATER PROFILE

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Millcreek is served by five separate culinary water providers, none of which are managed by Millcreek. Due to this, gathering data on usage can be difficult when since there is no one source that can show data for the entire city. Instead, staff and the consultant met with the water providers and collect what data they could pull for their Millcreek service areas. A majority of the culinary water in Millcreek is provided by Salt Lake City Department of Public Utilities (SLCDPU) and Jordan Valley Water Conservancy District (JVWCD).

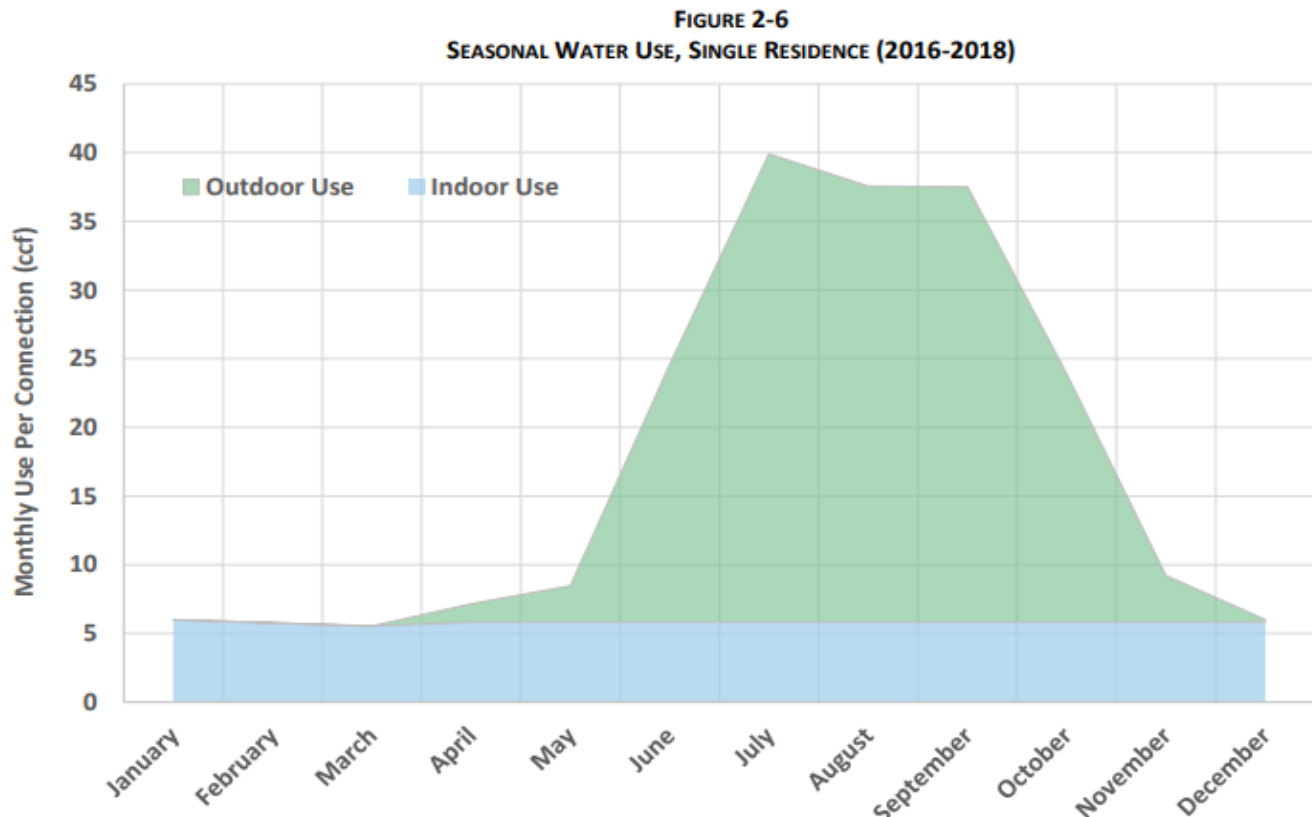


## USAGE

Data was collected from SLCDPU, JVVCD, and Holliday water. SLCDPU's data was the most detailed and came with a 5-year history. JVVCD only provided water usage numbers for their entire retail service area, not Millcreek specifically. Their retail service area spans a large swath of South Salt Lake City, parts of Murray, Millcreek west of 700 E, and a few disparate areas in southern Salt Lake County. Holliday water provided estimates of water use within the area they serve in Millcreek. Since all the data provided lacks standardized formatting and details, staff relied heavily on the SLCDPU data to generate a city wide water consumption profile.

Based on data provided from SLCDPU, the average user in the Millcreek service area is 208 gallons per capita per day (gpcd). Multiplying this average by the current Millcreek population, 64,913, produces a daily average usage of 13,501,904 gallons per day. Taking this number and multiplying it by 365, we get an annual consumption of roughly 4,928,194,960 gallons per year. When discussing large amounts of water like this, the usual metric is acre feet per year (AF). An acre foot is the amount of water to cover one acre of land one foot deep which is about 325,851 gallons. In this case, 4,928,194,960 gallons per year, converts to roughly 15,100 AF per year.

Most of Millcreek's water is consumed by residential customers. SLCDPU states that roughly 75 percent of the water provided to Millcreek is for residential uses. SLCDPU only serves part of Millcreek; however, many of the development patterns that exist in their service area are consistent within the service areas of other water providers. The water that is consumed by customers can be broken down into indoor and outdoor usage with indoor usage staying relatively consistent throughout the year and outdoor water spiking in the summer months of May through September. The highest user of outdoor water are single residence households. The graph below from the *2020 Salt Lake City Water Conservation Plan* shows the split between indoor and outdoor water usage for an average single household residence throughout the year.



(Ccf equals one hundred cubic feet or 748 gallons of water.)

# FUTURE WATER REQUIRMENTS

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The plan establishes consumption goals laid out every ten years with data points starting in 2024 and ending in 2060. Staff used current and projected population growth rates established in the 2024 Millcreek Housing Report to determine water consumption rates with and without conservation efforts.

Population growth rates were set at the following rates:

Year	Population	Projected Growth Rate
2024	64,913	6.7%
2030	69,093	6.4%
2040	73,480	6.4%
2050	77,169	5.0%
2060	81,028	5.0%

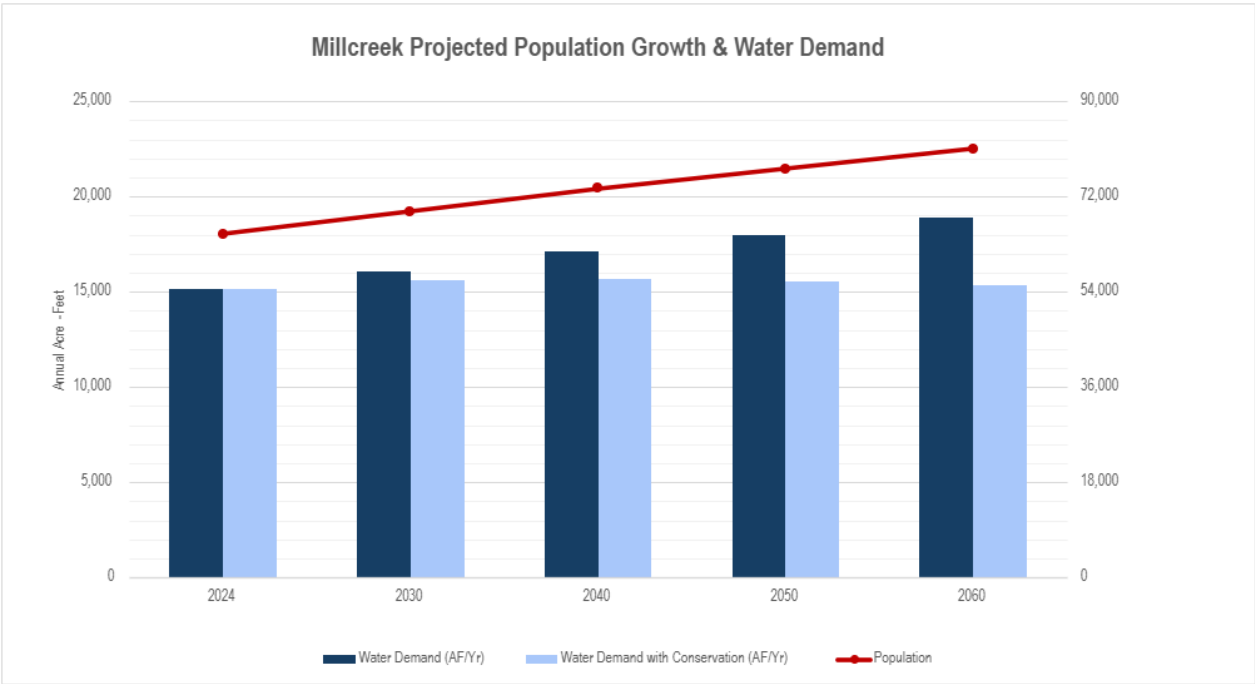
Based on these projected growth rates, water consumption, if maintained at the current rate, would be as follows:

- 16,097 AF/year in 2030,
- 17,119 AF/year in 2040,
- 17,979 AF/year in 2050, and
- 18,878 AF/year in 2060.

The water providers discussed with staff the need to be water conscious now to ensure ample water supplies in the future. Water providers, such as SLCDPU and JWCD, are required to adopt and follow water conservation plans that outline future water consumption and conservation efforts taken by the water providers. These conservation plans outline specific goals and benchmarks the providers plan to meet in order to continue to provide water service decades into the future. These plans help outline the need for preservation on the consumers end as well as the providers need for better conservation. Using the metrics found in these plans, staff and the consultant estimated the amount of water preservation needed to meet the water providers conservation goals outlined in their plan.

Estimating future population growth rates, consumption practices, and unforeseen events makes planning of water consumption 40 years into the future difficult due to all the variables present. Due to this, Millcreek will need to reassess population growth and water usage in coming years to ensure the estimates made in this plan hold up to changing realities on the ground. Updating Millcreeks population data and water consumption data from water providers is imperative for this plan to be effective in years to come.

Below is a graph showing water consumption without conservation, with conservation, and estimated population growth.



To meet the goals outlined in these plans, per capita water usage needs to decrease on average from the current 208 gpcd to 169 gpcd by 2060. While this may seem like a difficult metric to meet, it's worth noting that per capita water usage has been trending downwards for a number of years already, largely thanks to existing conservation goals, emerging water saving technology, and a better public understanding of the importance of water conservation in an arid climate. In the *2020 Salt Lake City Water Conservation Plan*, water usage in the SLCDPU service area dropped from roughly 280 gpcd in 2000, to 240 gpcd in 2007, to 208 gpcd in 2018. These numbers are based on SLCDPU system wide usage, so they do not necessarily reflect the usage in the Millcreek service area.

**If conservation of water is done diligently and in line with the adopted conservation plans of our water providers, then Millcreek will have reliable water into the future.**

## CONSERVATION

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To meet the goals outlined in the plan, conservation is paramount. Meeting these conservation goals is multi-pronged and must be done by multiple stakeholders, such as residents, governments, and businesses. Since Millcreek does not operate the water systems, only some efforts can be made by the city while others would have to be made by the providers themselves.

### EDUCATION

Education about the importance of water preservation and how to do it is imperative if the goals laid out in this plan are to be met. Millcreek has already been educating residents on water preservation and opportunities to save water. Printed and e-newsletters have outlined water saving strategies and rebate programs available to residents. Ongoing education programs through the newsletters are useful to keep residents up to date on the newest and best practices when it comes to water saving and conservation.



Seminars about water saving and waterwise plants can also be hosted at Millcreek City Hall in the coming years. The Jordan Valley Water Conservation Garden frequently puts on courses open to the public that discuss waterwise landscaping, rebate programs, and other water conservation methods.

## **LANDSCAPING**

One of the largest users of water is outdoor consumption for landscaping. This is especially pronounced in low density, single household neighborhoods, which constitutes the largest use of land acreage in Millcreek. Reducing outdoor water consumption is one of the best ways to reduce overall water consumption in the Millcreek service area.

Millcreek's new landscaping code already has provisions that limit the amount of turfgrass and water intensive plantings that can be allowed on a property. These rules affect new developments but are also applied when properties undergo major alterations. Allowances for turfgrass and other intensive plantings depend on the zoning of the property with manufacturing, commercial, and public properties largely prohibited from installing turfgrass unless under certain circumstances (parks, recreation areas, etc.). Single households are still allowed to install new turfgrass, however it must meet the LocalScapes provisions found in the landscaping code.

Water efficiency standards are also found in the code that outline the types of sprinklers that can be used and their flow rates. New developments must adhere to these standards while existing developments only need to come into compliance if there are major alterations to the property.

Low Impact Development (LID) is required for most new construction as well. LID consists of rain gardens, bioswales, and grassed swales to help reduce water waste and overload on the storm drain systems. LID improvements allow for water to permeate into the soil and back into the aquifer at a faster rate than traditional water runoff infrastructure.

## **LAND USE**

Land use plays a key role in water use and infrastructure improvements. **As residential density increases, water use tends to decrease per capita.** This is largely due to the decreased amount of landscaping that accompanies higher density developments. System loss from leaks and breaks also decrease with density as less infrastructure distance is needed to serve a higher population of residents.

Millcreek has two areas that accommodate high density housing, the Millcreek City Center and the Meadowbrook area on the west side. Additional moderate density housing is supported along certain corridors in Millcreek. These areas allow for higher density residential developments than other areas in the city and have rigorous landscaping standards that focus on water preservation. Each of these areas lie within separate water providers service areas. Each provider indicated to staff that they understood the increased density in these locations and what that would mean for system improvements such as upsizing water lines, new pressure demands on the systems, and the need for installation of new smart water meters.

## **ONGOING COMMUNICATION**

Constant and clear communication with water providers is key to ensuring that water demand and supply remain in balance. Since many of the assumptions and data points in this plan are subject to change over time, communicating those changes is important to ensure Millcreek and the providers are meeting their conservation goals. Currently, Millcreek and SLCDPU meet monthly to discuss new projects, system updates, and share data. Regular meetings like this should be done with all water providers to maintain relationships and up to date information.

## **COMMUNITY COUNCILS**

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Staff took this plan to the community councils during the week of December 5<sup>th</sup> to get comments and suggestions from the various community councils.

The Mount Olympus Community Council met on December 5<sup>th</sup> and discussed the plan with staff. The MOCC recommended that Millcreek staff work closer with Salt Lake City Department of Public Utilities to help influence policy related to water since so many residents rely on their service but have little to no say in policy. The council voted unanimously in favor of the proposed plan with the added goal of closer ties with SLCDPU.

The Millcreek Community Council had concerns about the data found in the plan, private property rights, and the State requiring Millcreek to adopt this preservation plan. Staff talked with members and answered what questions they could and explained why the state requires municipalities to adopt these plans. In the end, the council voted 6 in favor and 4 against adoption of the plan as proposed.

East Mill Creek Community Council voted unanimously in favor of the plan as proposed. Staff and council members discussed water issues in Millcreek and the region as a whole, as well as a few of the goals and strategies mentioned in the plan.

Canyon Rim Citizens Association does not meet in December but were sent the plan and staff memo. The chair of the association outlined some concerns in an email to staff. Concerns were that the plan lacked enough language surrounding tree canopy and how that can affect water use and general cooling. Mentioning in the plan how residents can currently work with the city to enforce bad water practices should be considered too (Report-a-concern). Lastly, concerns on how Millcreek would address getting to a lower water consumption goal were brought up, specifically how to track and ensure Millcreek is growing at the rate estimated in the plan and that water usage will be tracked diligently to ensure the plan is being met.

Comments and suggestions from these meetings are included in the proposed plan as much as possible.

## **CITY COUNCIL**

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The Millcreek City Council had a first reading on this item during their December 8<sup>th</sup> regular meeting. The reason for the item going to City Council before Planning Commission is due to the need to adopt this plan as early in 2026 as possible. Since there is no second City Council meeting in the month of December, staff decided to do a first reading now and then gather comments from the Planning Commission before going back to the City Council for a second reading in early January 2026.

The City Council received the memo sent to the community councils with an added executive summary discussing the adoption timeline and the initial comments from the community councils. The Council was presented the plan and asked questions of staff. One of the main recommendations was that the plan should discuss the importance of water quality when it comes to preservation. Keeping the water that flows into the Jordan River and the Great Salt Lake free of pollutants and detritus will help ensure fewer environmental problems down river.

Council members understood that this plan is a requirement of the state legislature and were happy to hear that the initial review by the Utah Department of Natural Resources stated that the proposed plan met the state's requirements.

## **PLANNING STAFF RECOMMENDATIONS**

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Planning staff recommend reviewing the attached Water Preservation Element and asking staff questions about the plan at the upcoming planning commission meeting. The plan is still in flux with changes to content, formatting, and narrative changing with reviews and suggestions by community councils and the city council. Staff would like to hear if there are specific areas that need to be better laid out, explained, or rewritten before the final draft goes before the City Council in January. At the time of writing this report, staff are currently updating the water preservation element and will send on the newest copy as soon as it is ready for review.

Upon review and discussion with staff during the regularly scheduled Planning Commission meeting, staff recommend that the Planning Commission forward a positive recommendation onto the City Council for adoption of this plan in January.

## **SUPPORTING DOCUMENTS**

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- **Draft Water Preservation Element**

## SUBCHAPTER 3.8: **WATER USE & PRESERVATION ELEMENT**

*Utah is home to the incredible Great Salt Lake as well as many freshwater lakes, rivers, and creeks, however, fast population growth and the arid Utah climate create a water scarcity issue that poses a serious threat to Utah's environment and economy. Preserving and protecting water helps ensure long-term sustainability, helps support local ecosystems, and secures reliable water for generations to come.*

### 3.8.1 **THE IMPORTANCE OF WATER PRESERVATION IN MILLCREEK**

In 2022, the Utah State Legislature adopted S.B. 110 was adopted, which requires that all municipalities, including Millcreek, include a water preservation element in its general plan. This plan intends to formally integrate water use and preservation planning into Millcreek's long-term development and maintenance strategies. Millcreek and its residents have shown year after year they care about preserving water and treating it as a precious resource, and this plan aims to continue those efforts into the near future and beyond.

Required components of the plan include:

- Effect of permitted development on water demand and infrastructure
- Methods for reducing water demand and per capita consumption for future development
- Methods for reducing water demand and per capita consumption for existing development
- Opportunities to modify operations to eliminate or reduce conditions that waste water







## 3.8.2 TRENDS

### Millcreek's Current Water Profile

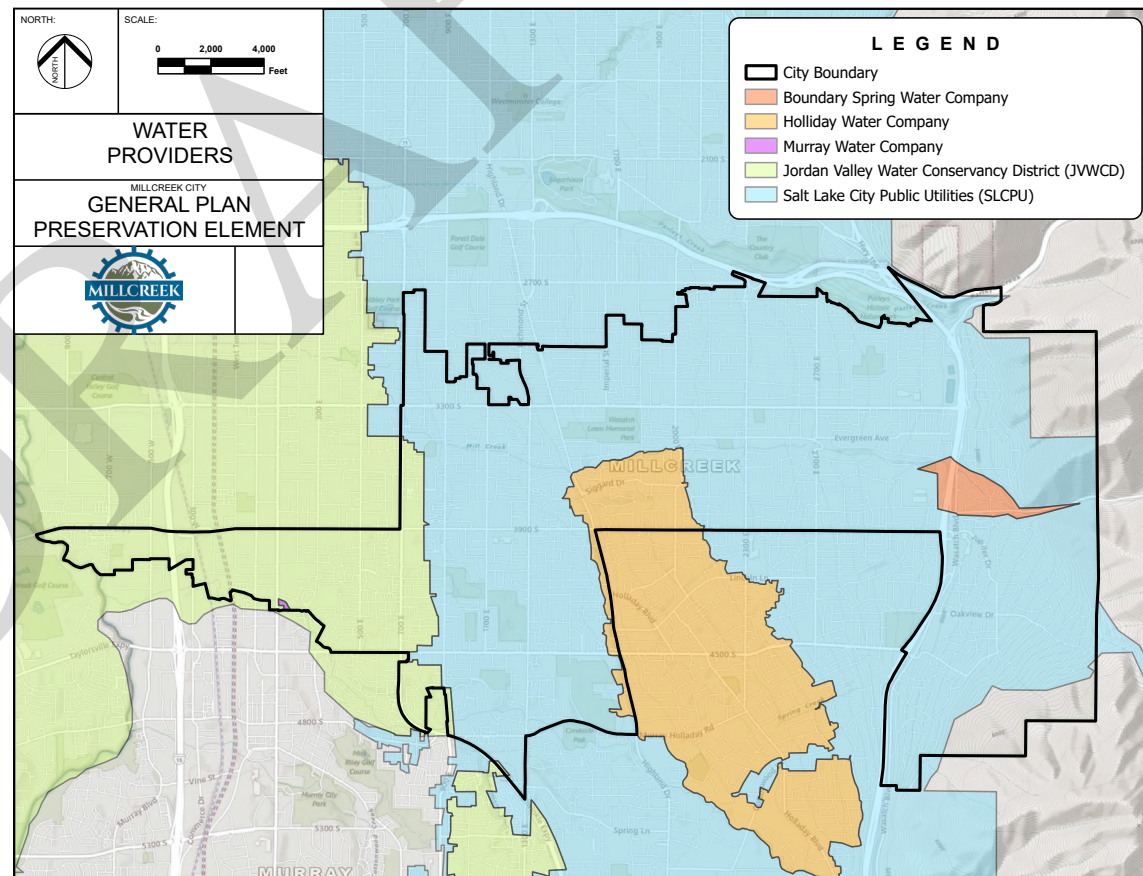
**Where does Millcreek get its water?** Millcreek does not operate its own water system. Instead, multiple water providers and businesses work together to provide water to residents throughout the city. These water providers manage the infrastructure, deliver water, and charge residents. These providers have an essential role in setting long-term water conservation goals so that Millcreek will have reliable water for years to come. The water providers are shown in the map to the right and are listed below:

- **Salt Lake City Public Utilities (SLCDPU).** The largest portion of Millcreek residences and businesses receives their water from Salt Lake City Public Utilities. This water provider serves not only Millcreek but also serves Salt Lake City and other municipalities in the area. For more information on SLCDPU, see their conservation plan at the following link: <https://www.slc.gov/utilities/>
- **Jordan Valley Water Conservancy District (JVWCD).** The second largest portion of Millcreek residences and businesses receives their water from the Jordan Valley Water Conservancy District. This district serves both wholesale and retail water to a number of communities throughout the Salt Lake Valley. For more information on JVWCD, see their conservation plan at the following link: <https://jvwcd.gov/public/conservationprograms>

- **Holliday Water Company.** A small, but not insignificant, portion of Millcreek is served by Holliday Water Company. This company mainly serves Holladay City but serves some Millcreek residents as well. Holliday Water Company gets some of its water through SLCDPU, and some of its water from its own sources. For more information on the

Holliday Water Company, see their water protection plan at the following link: <https://hollidaywatercompany.com/water-protection-plan>

- **Boundary Spring Water Company.** As a small-scale water provider, Boundary Spring Water Company serves about 150 homes in



Millcreek.

- **Murray City Water.** Murray City primarily serves water to its own residents to the southwest of Millcreek. A handful of properties within Millcreek are also served by Murray City Water.

#### *How is water currently used in Millcreek?*

In 2024, the population in Millcreek was approximately 64,913. Within the SLCDPU service area, the residential population makes up over 75% of annual water use. Other areas in the city may see higher water use from industrial or commercial users, but overall, the majority of water use in Millcreek is from residential customers.

#### *How much water does Millcreek currently use?*

Residents in Millcreek use water at home, at work, and recreationally. Gallons per capita per day (GPCD) is the standard way to measure water use for an area based on population and is a common practice among water professionals. Current water demand trends from the SLCDPU conservation plan show that water sales in the Millcreek service area are approximately 208 GPCD. This means that in 2024, water sales within Millcreek were approximately 15,100 acre-feet.

#### *Besides drinking it, how is water consumed?*

Water usage can be split into indoor and outdoor use. Indoor water consumption stays consistent throughout most of the year, while outdoor water usage increases dramatically in the summer months of May through September. Specific land uses such as residential, industrial, and commercial all have different consumption patterns when looking at indoor and outdoor

usage.

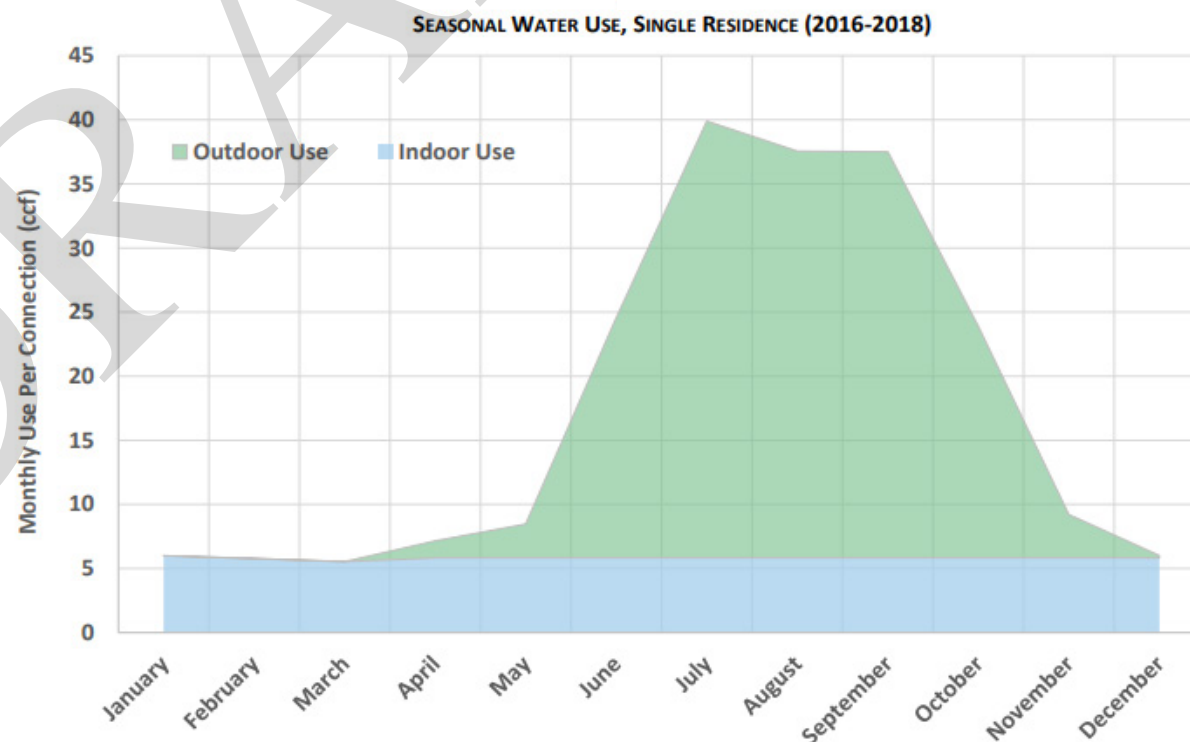
The figure below shows the use of water split between outdoor usage (green) and indoor usage (blue) for an average single family residence in the SLCDPU service area. This figure is taken from the *2020 Salt Lake City Water Conservation Plan*.

Low density single household residences have the highest amount of outdoor water consumption of all land use types. The figure below shows the average household water usage for a single residence. This data is taken from the *2020 Salt Lake City Water Conservation Plan* and gives a

general idea of water consumption practices in the SLCDPU service area.

Uses such as industrial and commercial frequently have higher indoor consumption and significantly lower outdoor consumption due to a frequent lack of significant outdoor landscaping associated with these uses.

Based on data provided by SLCDPU, water consumption within the Millcreek service area between 2020 and 2024 averaged 78% residential use, 12% commercial use, and 10% industrial use.





**Where does Millcreek's water come from?** As previously discussed, Millcreek relies on multiple water providers for its water. Our water comes from rivers, creeks, wells, and springs, all over the Salt Lake Valley. To find additional details on water sources and infrastructure that serve residents, the first step is to identify the correct water provider by looking at the "Water Providers" figure within this report or by typing an address into the State of Utah's water system search: <https://deq.utah.gov/drinking-water/water-system-search-form>. After identifying the applicable water provider, the second step is to read the water provider's "Water Conservation Plan" to get the desired details.

## Future Water Requirements in Millcreek

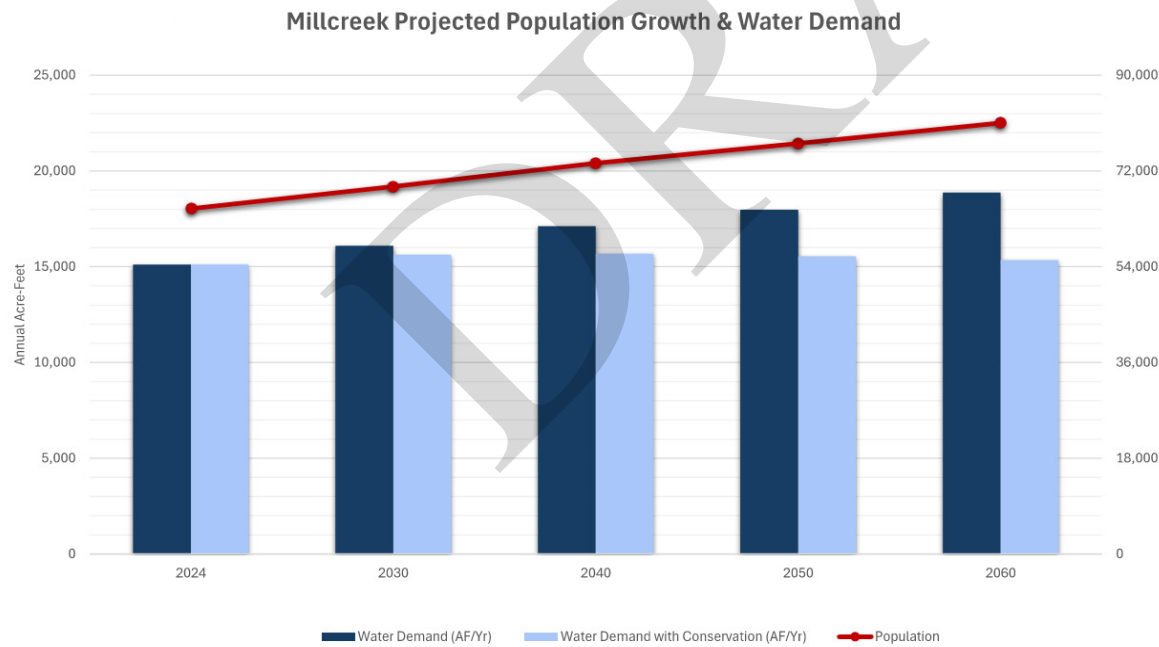
What does Millcreek's future water use look like? Do we have enough water for our community?

**What is Millcreek's water demand without conservation?** The population of Millcreek is projected to increase relatively steadily, and will be about 77,200 people by 2050. Most of this growth is expected to occur through increasing residential density. Because Millcreek is essentially built out, our projected growth is significantly smaller than other communities in Utah. If water use patterns and per-capita water use remains the same as it is right now, the total annual water sales will increase to about 19,000 acre-feet by 2060.

**What is Millcreek's projected water demand with conservation?** To meet the requirements of Millcreek's water providers, conservation is required. To meet the goals within SLCDPU's conservation plan, Millcreek needs to drop its usage by 2.9%, 8.4%, and 18.7% by 2030, 2040, and 2060 respectively. This equates to a reduction from 208 GPCD to 202 GPCD by 2030 and 169 GPCD by 2060 in order to meet the plan's requirements for conservation. Based on these per-capita water use values, the total annual demand needs to be no more than 15,300 acre-feet by 2060. The figure to the left shows Millcreek's projected population and water use.

**Do we have enough water for our future?** As discussed above, Millcreek does not manage its own water supply but rather supports its water suppliers in meeting their goals and requirements. Subsequently, it is not possible to define an exact supply for Millcreek as growth and conservation in other parts of the water suppliers' service areas will affect overall water availability. To mitigate this uncertainty, Millcreek staff is in constant communication with the two major water suppliers – Salt Lake City Public Utilities and Jordan Valley Water Conservancy District. **Both SLCDPU and JWCD have stated that, as long as Millcreek meets the water conservation goals set and discussed within this planning document, and future growth does not exceed the projections contained here, there will be reliable water for Millcreek into the future.**

The figure illustrates, that while the population steadily increases over time, Millcreek's total annual water use is projected to increase by only 200 acre-feet between 2024 and 2060 as a



SOURCE: BOWEN COLLINS & ASSOCAITES

result of conservation efforts. In order to meet the requirements of the water providers and secure water for the future, these conservation efforts must be successful in reducing water demands. As detailed below, Millcreek has already been making progress.

### 3.8.3 VISION & PRINCIPLES

Since incorporation, Millcreek has worked with residents and new developments to design water efficient landscaping and watering standards. Because Millcreek is not a water provider, it can be difficult to manage water usage. However, through incentives and landscape reviews, existing homeowners and new developments have been much more focused on landscaping and water practices that reduce overall consumption of water.

#### How is Millcreek Managing Outdoor Water Usage?

Outdoor water consumption is one of the drivers of demand in Millcreek. Reducing outdoor water usage through better landscape standards, smarter infrastructure, and more rigorous efficiency standards is a key way to reduce Millcreek's overall water consumption now and into the future.

#### *Waterwise landscaping for current and new development*

In 2023, Millcreek updated its landscaping standards to align with modern waterwise standards set out by the Central Utah Water

Conservancy District. These standards apply for new development and allow existing developments to be altered in ways that maximize water preservation.

Since adopting these standards, Millcreek has seen businesses and private residences remove high water landscaping and replace it with waterwise plantings that mimic the natural environment in terms of water use, plant selection, and biodiversity. Prior to the ordinance's adoption, Millcreek's landscape standards did not permit modern waterwise standards, so residents could not participate in rebate programs for replacing their water intensive landscaping.

The updated standards follow the best practices to reduce water usage and waste while allowing homeowners and businesses to still have landscaping that fits their needs. All new development must meet these standards and redevelopment over certain sizes must also comply with these standards.

#### *Hydrozones*

Millcreek's landscape standards also include planting standards for plants with similar water needs. This section is broken up into different "hydrozones" based on the frequency of watering. The hydrozone standard ensures that low water plants are used correctly and grouped to prevent over or under watering of plants on a site. As the needed frequency of watering increases, there is a limit outlined that no more than 10 percent of plant material may fall into the highest water use hydrozone.

#### *Water Efficiency*

Millcreek's landscaping code requires water efficient irrigation systems for new landscape projects. These standards outline how and when to use drip emitters versus overhead sprinklers and operational procedures for each. There are also standards for automatic controllers, valves, pressure regulation, and use on slopes above 30 percent. New watering systems must achieve a minimum efficiency of 75 percent for fixed spray systems and 70 percent distribution efficiency for rotor systems.

#### *Turfgrass*

Turfgrass that is allowed to be installed has been significantly reduced for new developments within the city. Commercial, manufacturing, institutional, and public properties are prohibited from installing turfgrass. Mixed use and mixed household developments are prohibited from installing turfgrass for ornamental or aesthetic uses, but are allowed to install turfgrass for recreation facilities and sports fields. Single and two household homes are currently permitted to install turfgrass so long as it meets the LocalScape design standards found in the landscape standards.

HYDROZONE	IRRIGATION FREQUENCY	NOTES
Zone 0	Little or no water needed	Plant material in Zone 0 and 1 with water use requirement, as noted in the Millcreek Plant Species List, shall be used at the interface between urban areas and natural (non-irrigated) open space
Zone 1	Plants require supplemental irrigation once per month	
Zone 2	Plants require supplemental irrigation twice per month	No more than ten percent (10%) of plant material may fall under zone 3 and/or 4 watering frequency
Zone 3	Plants require supplemental irrigation once per week	
Zone 4	Most intensive water-use zone, plants require supplemental irrigation twice per week	





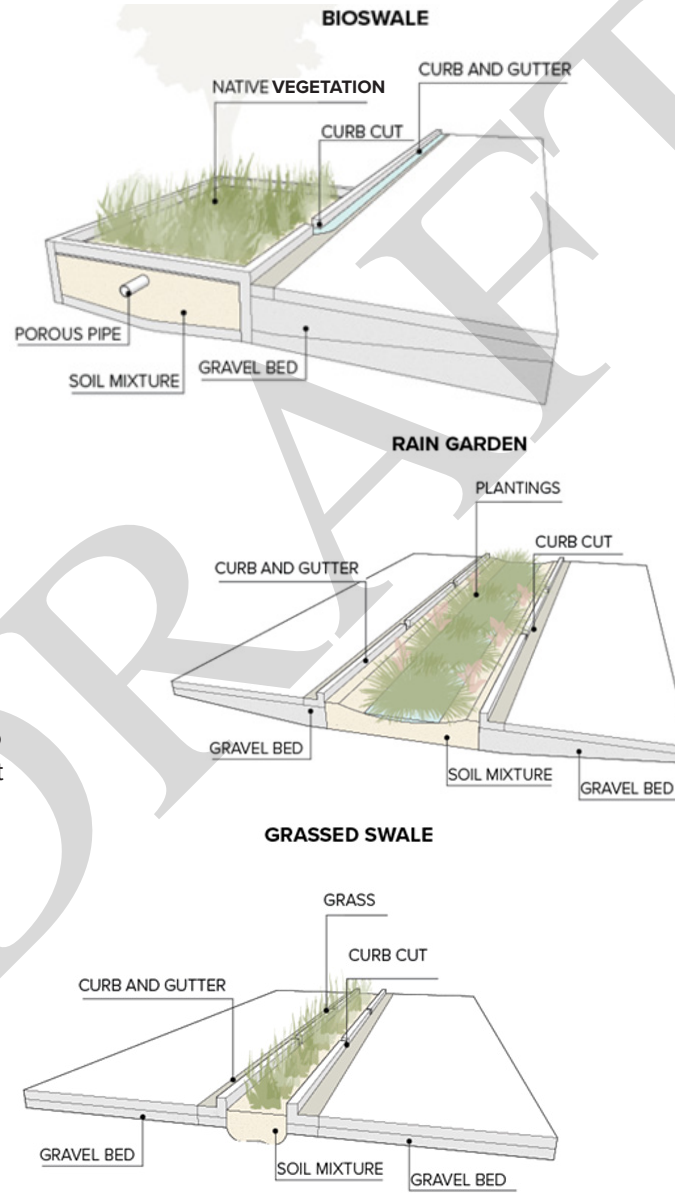
### **Low Impact Development (LID):**

Low Impact Development is required for new developments in Millcreek, especially when bordering parking lots or areas with impervious surfaces. LID consists of incorporating rain gardens, swales, and bioswales to reduce water waste. These types of infrastructure allow for water to permeate the soil and return to the aquifer. Examples of these can be seen to the right.

**Bioswales.** Bioswales are vegetated swales planted with various plant species that can tolerate occasional water inundation and serve to transport, store, and allow water infiltration.

**Rain Gardens.** Rain gardens are small, shallow, depressions planted with a variety of native or ornamental plants that can treat small amounts of runoff to improve water quality.

**Grassed Swales.** Grassed swales are designed to convey water over the ground's surface to a point of disposal and serve to slow water flow, allowing some particulates to drop out before the water reaches the disposal point.



### **How is Millcreek Currently Working to Preserve Water?**

Millcreek currently uses multiple strategies to ensure water is preserved for current and future generations. Landscaping standards, land use, and water savings programs are some of the ways Millcreek works to ensure water is used efficiently and that residents can use incentives to better preserve their own water.

#### **Land Use**

Land use is one of the biggest tools when it comes to preserving the future of water in Millcreek. According to the *Utah Growing Water Smart* guidebook published by Western Resource Advocates the density of development can play a large role in per capita water consumption. Higher density developments (3-8 units per acre) tend to use less water per capita due to less outdoor landscaping and less water leakage from water delivery systems.

Most of Millcreek's existing land use is low density residential development built throughout the 20th century. This pattern can be found all across the city, but tends to be more common on the east side. Inserting high density uses into these established neighborhoods is not something that would be easy or is sought after by residents, city council, or staff. Instead, areas that can readily fit increased density are ideal for new clustered, higher density development.

There are two areas in Millcreek where a majority

of new higher density development is slated, in the Millcreek City Center, and on Millcreek's west side, frequently referred to as the Meadowbrook area.

The Millcreek City Center, located near the intersections of 1300 E and 3300 S, and Highland Drive and 3300 S, consists of a mix of higher density residential buildings, civic services, and commercial businesses. The Millcreek City Master Plan can be found at this link: <https://www.millcreekut.gov/DocumentCenter/View/874/Millcreek-City-Center-Master-Plan---Adopted-June-10-2019-PDF>

The Meadowbrook area, which is located on Millcreek's west side, has seen significant new development in the last ten years. A majority of the new development has been high density residential. Newly adopted station area plans that cover this area call for increased density and new infrastructure to help spur more development in the area. The Meadowbrook area is described in more detail through out this document, specifically on page 52.

### **Utah Water Savers**

Millcreek's code allows for residents to participate in rebate programs laid out and operated by the Utah Water Savers program. Waterwise landscape standards and the inclusion of LocalScapes language in code allows for residents to alter their private property, residential or commercial, in line with the requirements outlined by the Utah Water Savers Program.

### **Rain Barrel Sales**

Every year, Millcreek and surrounding communities have participated in Utah River Councils RainHarvest program that helps residents obtain rain barrels at reduced prices. Rain barrels are a great way for residents to practice water preservation on their own property without the need for costly property improvements. Rain harvesting was legalized in Utah in 2010 and residents are allowed to harvest 2,500 gallons of rain water per year. This program allows for residents to purchase rain barrels for \$85 instead of the market rate of \$155 per barrel.

### **Current Landscaping & Water Use Ordinances**

Millcreek's landscape standards were created with waterwise concepts included throughout. In 2023, Millcreek adopted new landscape standards in its zoning code that apply to new development and redevelopment within the city. This chapter of landscape standards was created with help from the Central Utah Water Conservancy District to ensure that the standards balance water savings and plant viability.

Rebates and programs that incentivize waterwise landscaping have helped residents and businesses switch to better landscapes that reduce outdoor water consumption. These rebates and programs help with costs associated with replacing landscaping and explain how and why these waterwise landscapes work. An example of a waterwise park strip can be seen to the right.



SOURCE: JORDAN VALLEY WATER CONSERVATION DISTRICT





### Newsletters & Outreach:

For years, Millcreek has been diligent in getting the word out about water preservation to residents in the city. Through social media, e-newsletters, and print newsletters, Millcreek has been regularly informing property owner and residents on how to reduce their water consumption. Articles discuss the rain barrel program discussed above, waterwise tips and ideas, and classes about reducing water waste in the park strip.

## Why Harvest Rain With A Rain Barrel?

Why should I use a rain barrel?

Stormwater is water that does not infiltrate into the ground; it flows across the ground and impervious surfaces into streams, rivers, lakes, etc. Homeowners can implement Best Management Practices to reduce the amount of stormwater runoff.



## BE IN THE KNOW

POLICIES | ORDINANCES | PROCEDURES

Installing rain barrels under downspouts is a low-cost BMP that can help reduce stormwater runoff. The amount of water purchased from

## Want to Make Your Lawn Water-Wise?

### REBATES FOR HOMEOWNERS

Homeowners may be eligible for rebates of \$2 to \$3 per square foot of lawn. Simply follow the guidelines and a landscape plan

### REBATES FOR HOMEOWNERS ASSOCIATIONS AND COMMERCIAL USERS

Homeowners Associations and Commercial users can receive a similar rebate through the Landscape Leadership Grant, which is funded through one of two sources: If

## Waterwise Tips

**THIS WAS AN EXCEPTIONALLY DRY WINTER WITH THE AMOUNT OF WATER IN SNOW ACCUMULATION WELL BELOW AVERAGE. EXPERTS SAY THAT WE ARE IN THE THROES OF A HISTORIC DROUGHT. HERE ARE SOME THINGS YOU CAN DO:**

The Utah Division of Water Resources produces a weekly report of how often residents should water their lawns. You can follow this reliable Weekly Lawn Watering Guide designed exclusively for Salt Lake County to help you determine when and how much to water on the Division of Water Resources website at [conservewater.utah.gov/weekly-lawn-watering-guide/](http://conservewater.utah.gov/weekly-lawn-watering-guide/).

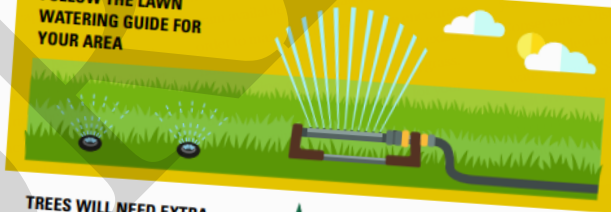
The normal rule of thumb is that one irrigation is equivalent to 20 minutes with pop-up spray heads and 40 minutes with impact rotor sprinklers. The state watering experts estimate that Utah could save more than 20 billion gallons of water in the summer if everyone cut back their water usage by 10% and watered according to the Weekly Lawn Watering Guide.

There are some easy ways to conserve. Tune up and adjust your sprinklers to be sure you are not watering the street, install a smart irrigation controller and bring out the hose to hand water dry spots.

Now that it's extra hot outside, we need be aware of the extreme need for water conservation. That's just the way it is living in the second driest state in the Union during a drought.

So please, do your part, Slow the Flow and be Waterwise!

### FOLLOW THE LAWN WATERING GUIDE FOR YOUR AREA



### TREES WILL NEED EXTRA WATERING THIS YEAR TO SURVIVE



### SPOT AND SLOW DRIP WATERING HELP CONSERVE SCARCE RESOURCES



## WATERWISE PARK STRIP LANDSCAPING CLASS

Looking to switch out the lawn in your park strip for something more water-efficient? Led by Central Utah Water Conservancy District, this class will give you the guidance you need to get started. Together, we will learn about the types of plants and maintenance techniques best suited to park strips, as well as the park strip conversion rebate incentive known as "Flip Your Strip." Become eligible for a greater rebate just by attending this class!

DATE: MARCH 8, 2022  
TIME: 7:00 P.M.

HOSTED VIRTUALLY

Please register in advance at:  
[www.cottonwoodheights.utah.gov/sustainability](http://www.cottonwoodheights.utah.gov/sustainability)

### Water Provider Outreach

Since Millcreek has multiple water providers, coordination and cooperation with them is key to ensuring long term water availability for residents. A large majority of the culinary water in Millcreek is provided by SLCDPU, and JVVCD. As part of the creation of this plan, Millcreek staff met with officials representing both providers and discussed future projects, current system demands, and their respective conservation plans.

Millcreek also sent out questionnaires to all culinary and secondary water providers asking what challenges they each face and what Millcreek can do to help their respective conservation goals. In total, Millcreek sent out 11 questionnaires to the culinary water providers and canal companies that serve Millcreek. Of these questionnaires, Millcreek staff only received four back, two from canal companies and two from culinary providers.

The canal companies that responded cited aging infrastructure and new development as their largest concerns going forward. Many of these canal companies have older infrastructure that can leak and create issues getting water to share holders. Upgrading this infrastructure to maintain water deliveries to their existing water share holders was the main goal stated by the two companies that responded.

Holliday Water and JVVCD responded to the questionnaire as well. In JVVCD's response, they outlined their contingency plans, efficiency standards, and their overall confidence that they will be able to continue to serve a growing population in the valley so long as efficiency standards are upheld. Currently, they serve

780,000 residents with the ability to add an additional 420,000 by 2065. Staff also met JVVCD officials at City Hall to discuss further preservation measures that JVVCD are pursuing and how they interface with Millcreek policies and ordinances.

Holliday Water is a much smaller water provider that does not have the same capacity and distribution network of utility providers such as JVVCD and SLCDPU. The area they serve is largely built out and new development that takes place will be more dense than most of the existing development in the area. The increase in density will strain their existing infrastructure as it has been laid out and built for low density land use.

SLCDPU did not respond with a filled out questionnaire, but rather met with staff to discuss their system, issues Millcreek faces, and other considerations to take into account when planning for better water preservation. Ongoing meetings between SLCDPU and Millcreek Planning & Public Works Departments occur monthly. These meetings allow SLCDPU and Millcreek to discuss changes to infrastructure, system upgrades, and preservation measures.

### Creating a Water Education Program

There are many ways for existing and future water users in Millcreek to save water. The *Utah Regional Municipal and Industrial Water Conservation Goals Report* recommends a variety of water conservation practices that both residents and city governments can use. Millcreek also has a water conservation guide accessible to the public on the website that provides direction on good water use practices.

The guide can be found at the following link: <https://www.millcreekut.gov/DocumentCenter/View/2331/Water-Conservation-Guide>

Millcreek educates its residents on many of these practices already, however, there is still room for growth. Millcreek plans to formalize its education program by incorporating the following measures into the City's schedule:

- **Highlight Water Providers in City Newsletters.** Millcreek sends a printed monthly newsletter and a weekly e-newsletter to residents and subscribers. Articles that highlight water providers will be featured twice per year.
- **Hold an Annual Waterwise Seminar.** Millcreek has had immense success with attendance at Millcreek Common and City Hall, in part due to its engaged and active population. Millcreek has created a goal to schedule an annual waterwise seminar at the City Hall with open admission to all residents. Jordan Valley Water Conservancy District Conservation Garden would be an ideal fit to lead the seminar. This will allow residents to learn about the guiding principles discussed above and how they can implement waterwise practices within their communities and at their homes.
- **Have Continued Engagement at Community Events.** When practical, Millcreek staff will continue to set up educational booths at community events. Staff at the booths will be prepared with resources and information for residents that pass by. Staff can also use these booths to gather feedback from residents on how





well water preservation is being handled at throughout the city.

#### ***Participating in Regional Collaboration:***

Millcreek is already actively participating in regional collaboration with its water providers and canal companies. The landscape code is a major part of this collaboration. Millcreek intends to have its primary water providers, JVVCD & SLCDPU, and the State's Division of Water Resources, review its code periodically and recommend changes as needed.

Another major part of regional collaboration is the endorsement of water rates. Water rates can play a key role in conservation. For example, a tiered water rate charges more per gallon of water the more water is used. This encourages lower water use per customer because the less water is used, the less expensive it is per gallon. Both of Millcreek's primary water providers, JVVCD and SLCDPU, have recently implemented conservation minded rate structures. By endorsing these rates and educating its residents on the importance of conservation minded rates, Millcreek can help explain the need for increasing costs.

#### ***Improving Government Facilities:***

As Millcreek grows, government facilities will need to be constructed, retrofitted, and upgraded to respond to the changing needs of residents and the changing environment. Government buildings and facilities need to be water efficient and employees need to understand the importance of water preservation now and into the future.

Currently, the parks in Millcreek are largely managed by Salt Lake County Parks and

Recreation. This means that Millcreek does not always have the opportunity to make these changes, however, as new parks are created, Millcreek can ensure they are built to waterwise standards. Although the County manages many of Millcreek's parks, water efficiency upgrades have already been done by the County on some parks within the county park system.

New city buildings will incorporate waterwise landscaping and use smart meters to help monitor water consumption. Having separate meters for indoor and outdoor consumption may help Millcreek track where and how water is being used for government facilities.

Best indoor water use practices should also be common place in government facilities. To achieve this, there will need to be regular training during city all staff meetings about water usage. The same all staff meetings can discuss waterwise practices for employees personal property as well.

### **How can Millcreek Residents Preserve Water?**

Water preservation takes many forms such as reducing overall water usage, changing habits, and planning smarter outdoor areas. While some actions will have more impact than others, all practices focused on water preservation help reduce demand on our water systems.

Reducing outdoor water consumption is the easiest way for Millcreek residents to reduce their water consumption footprint. Other strategies work as well, however, outdoor water consumption is by far the largest user of water that most residents can change.

### **Indoor & Outdoor Water Use Guidelines**

#### ***Indoor water saving strategies:***

- Fix and stop leaks from pipes, sinks, and toilets.
- Only run full laundry loads.
- Only run the dishwasher when full.
- Reduce shower times.
- Turn off water connections when out of town and during winter.
- Do not let the water run when brushing teeth, cleaning dishes, or shaving.
- Install low water usage fixtures (toilets, sinks, appliances, etc.).

#### ***Outdoor water saving strategies:***

- Remove high water consumption plants and plantings (grass, non-native species, etc.).
- Install drip emitters and low flow watering devices.
- Water outdoor plants at ideal times to reduce evaporation.
- Use mulch where possible to retain soil moisture.
- Install smart water meters.
- Install smart controllers for sprinklers.
- Cover pools and hot tubs to reduce evaporation.

### 3.8.4 GOALS & STRATEGIES

The Millcreek Together General Plan already outlines multiple goals that pertain to sustainability and preservation. These goals have helped shaped policy, code, and perspectives about water and land usage in Millcreek. Listed below are just a handful of the goals outlined in the existing plan that pertain to water usage and preservation:

- **SUSTAINABILITY. GOAL E-7:** Promote environmentally sustainable efforts and initiatives in the public and private sector.
- **ENVIRONMENTAL SUSTAINABILITY. GOAL HE-5:** Promote sustainable practices in the preservation, development, and maintenance of Millcreek's natural and built environments.
- **AIR AND WATER. GOAL HE-6:** Implement standards, policies, and practices that encourage and support enhanced air and water quality.

These goals, along with others, have helped Millcreek make smart choices when it comes to water preservation before the state legislature required such measures. New goals are also needed to ensure Millcreek can meet its preservation goals outlined in this planning document.

#### **REFINE. GOAL W-1: Continue to refine and enhance Millcreek's vision for protecting water resources.**

- Strategy 1.1: Develop a portfolio of recommended waterwise standards for new and redevelopment based on State water use recommendations, Water Utility Conservation Plans, and City specific needs.
- Strategy 1.2: Establish a regular review of this plan to ensure the City is meeting its goals and properly implementing the proposed measures.
- Strategy 1.3: Do not approve densities that result in a population of over 81,000 people by 2060. A mindset that considers water conservation will be used when considering any changes to this density.

#### **COOPERATE. GOAL W-2: Promote cooperative regional practices for water use and conservation.**

- Strategy 2.1: Endorse the concepts and ideas outlined in the water conservation plans of Jordan Valley and Salt Lake City by using the ideas to create City outreach and educational material.
- Strategy 2.2: Engage in regular collaboration with water utilities and Utah DWR to ensure Millcreek is up to date on any water preservation measures or updates to laws and

policies.

- Strategy 2.3: Formalize a water education program in partnership with water providers and the Utah DWR

#### **IMPLEMENT. GOAL W-3: Implement water conservation measures that address local needs and minimize unnecessary consumption of water resources.**

- Strategy 3.1: Identify what waterwise policies are working well and identify areas that could be improved by collaborating with various institutions in Millcreek, including applicable water providers, Salt Lake County Parks and Recreation, School Districts, Churches, Canal and Irrigation Companies, Golf Courses, etc.
- Strategy 3.2: Gather feedback from Millcreek residents on their perspectives on water use in the City and make changes and improvements to water policies as needed.
- Strategy 3.3: Consider water preservation guidelines before approving changes to the City's land use planning documents.
- Strategy 3.4: Encourage water saving measures such as participation in the Utah Water Savers program and installing smart meters. Constantly be searching for new and improved incentivization programs.





**MILLCREEK**  
TOGETHER



SOURCE: SEVEN  
CANYONS TRUST

**Millcreek City Council**

Cheri Jackson, Mayor  
Silvia Catten, District 1  
Thom DeSirant, District 2  
Nicole Handy, District 3  
Bev Uipi, District 4



**Millcreek City Hall**

1330 East Chambers Avenue  
Millcreek, Utah 84106  
Millcreekut.gov  
801-214-2700

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CU-25-009

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**Planning Commission Staff Report**

**Meeting Date:** 12/17/2025

**Applicant:** Brandi Defa

**Re:** Conditional Use Permit

**Property Address:** 715 E 3900 S

**Zone:** Residential Mixed (RM)

**Prepared By:** Zack Wendel

**Scope of Decision:** **Administrative.** This is an administrative matter to be decided by the Millcreek Planning Commission upon receiving a recommendation from the Community Council(s). Your recommendation should be narrow in scope and primarily based on state statute and adopted local zoning, land use, and development codes.

**REQUEST AND SYNOPSIS:**

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The applicant, Brandi Defa, is seeking a conditional use permit (CUP) to allow a business office for an outcall service at 715 E 3900 S. This property is an existing office complex located within Millcreek's Residential Mixed (RM) Zone. An outcall business is a sexually oriented business. Land use regulations around sexually oriented businesses are heavily influenced by case law and legal precedent, and cities are required by caselaw to establish reasonable standards that permit the location of sexually oriented businesses. Millcreek's Zoning Ordinance provides that a sexually oriented outcall business may operate in the Residential Mixed (RM) Zone subject to a conditional use permit and obtaining a business license. (MKZ 18.76.030.B.3.d.1)

The applicant will use the office space only to maintain employee/independent contractor records and contracts, maintain financial records, and process and book appointments. No outcall services will occur at this location.

This property is an existing office complex, with no new development proposed in conjunction with the conditional use permit application.

**CONDITIONAL USE REVIEW:**

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**Standards for Review:**

The Planning Commission and Staff, in their review capacity, may impose site plan modifications and conditions to mitigate the reasonably anticipated detrimental effects of conditional use. Mitigation is required of reasonably anticipated detrimental effects arising from the conditional use, per the standards of approval as specifically listed in City Code Section 18.15.030.A(4).

**MKZ 18.15.030.A Conditional Use Permit**

Conditions of Approval: Unless otherwise specified in this Code or Utah Code Section 10-9a-507, Conditional Uses, the Planning Commission shall approve all conditional use applications with objective standards as set forth in the Land Use Code. In such cases, any conditions attached to approvals shall be directly related to the anticipated detrimental effects of the proposed use or development. No conditions of approval shall be less restrictive than the requirements of this Code, except where the Code allows flexibility. All conditional uses are presumed to be compatible with the zone and the General Plan's intent.

Denial: If the reasonably anticipated detrimental effects of a proposed conditional use cannot be substantially mitigated by the proposal or the imposition of reasonable conditions to achieve compliance with applicable standards, the Land Use Authority may deny the conditional use.

**STAFF FINDINGS:**

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**Findings:**

1. The property is approximately 1.43 acres and contains three structures totaling approximately 25,000 square feet of office/commercial space. No outcall services will occur at this location.
2. The structures were initially built between 1975 and 1976 as commercial office space.
3. The current uses on the property are massage therapy/spa, office, salons, and a tattoo studio.
4. The site has parking access located on both 3900 S and 700 E with curb, gutter, and sidewalks.
5. The parking lot has approximately 62 parking stalls. The parking lot, however, will need to be restriped to delineate individual parking stalls better.
6. The parking lot should be able to accommodate the proposed business and the employees and customers associated with the other businesses located at this site.
7. The property to the north is a skilled nursing facility. The property to the east is a medical facility. The property to the south is an Arctic Circle, along with other salons and office spaces. The property to the west is outside Millcreek's jurisdiction and appears to be a bank with more office/commercial space.
8. All landscaping is existing and/or otherwise appears to meet the current landscape standards.
9. Millcreek's Zoning Ordinance for sexually oriented businesses provides that a sexually oriented outcall business may operate in the Residential Mixed (RM) Zone, subject to a conditional use permit and obtaining a business license. (MKZ 18.76.030.B.3.d.1). The applicant will use the office space only to maintain employee/independent contractor records and contracts, financial records, and to process service requests and bookings. No outcall services will occur at this location.
10. The office space occupied by the proposed business will be approximately 207 square feet.
11. The office will be staffed with one person per shift, during the hours the outcall providers are



working.

12. All the Applicant's employees will be licensed through the Unified Police.
13. There will be no large signage or advertising at the office location. The only proposed signage will be a window sign on the entrance door, to help locate the office in case of an emergency.
14. Clients will never visit the office or make in-person bookings. Bookings will be done online or by phone.

## CONCLUSIONS:

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Based on the findings listed above, the following conclusions can be made:

1. The proposed business appears to meet all but one of the approval criteria for a Conditional Use Permit. Staff has determined that the current parking lot is not fully in compliance with off-street parking standards as the parking spaces are faded or gone and Millcreek's Parking and Mobility Standards requires parking spaces to be arranged and marked to provide the orderly and safe loading or unloading, parking, and storage of vehicles. (MKZ 18.63.020.A.4.b)
2. The applicant is following the required process set forth in Millcreek's Sexually Oriented Business ordinance for business office use of an outcall service. (MKZ 18.76.030.B)
3. The site is an existing office/commercial property. There is no proposed development with this application.
4. Lighting, fencing, landscaping, waste removal, and other similar aspects are anticipated to remain non-nuisance issues, so long as these items are continued to be well-maintained by the property owner.
5. The scope of the business at this location will be office use only, and many of the reasonably anticipated detrimental effects associated with sexually oriented businesses are mitigated by the fact that the proposed use will functionally be an office, provided all services will occur off-site.

## RECOMMENDATIONS:

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Staff recommends that the Millcreek Community Council take public comments and make a positive recommendation to the Planning Commission regarding the conditional use permit for the property located at 715 E 3900 S subject to the following conditions:

- The applicant shall work with the property owner to provide a plan of action to re-stripe the parking lot and have one (1) year to complete the work.
- Only business-office use will be allowed at the location, and no outcall services will occur at this location.

### Millcreek Community Council:

On Dec 2<sup>nd</sup>, 2025, Millcreek Community Council held a meeting to review, discuss, and take public comment pertaining to the proposal and made a positive recommendation to approve the proposed conditional use permit with the condition to restripe the parking lot removed. The vote was 6 in favor, 1 opposed and 3 abstained.

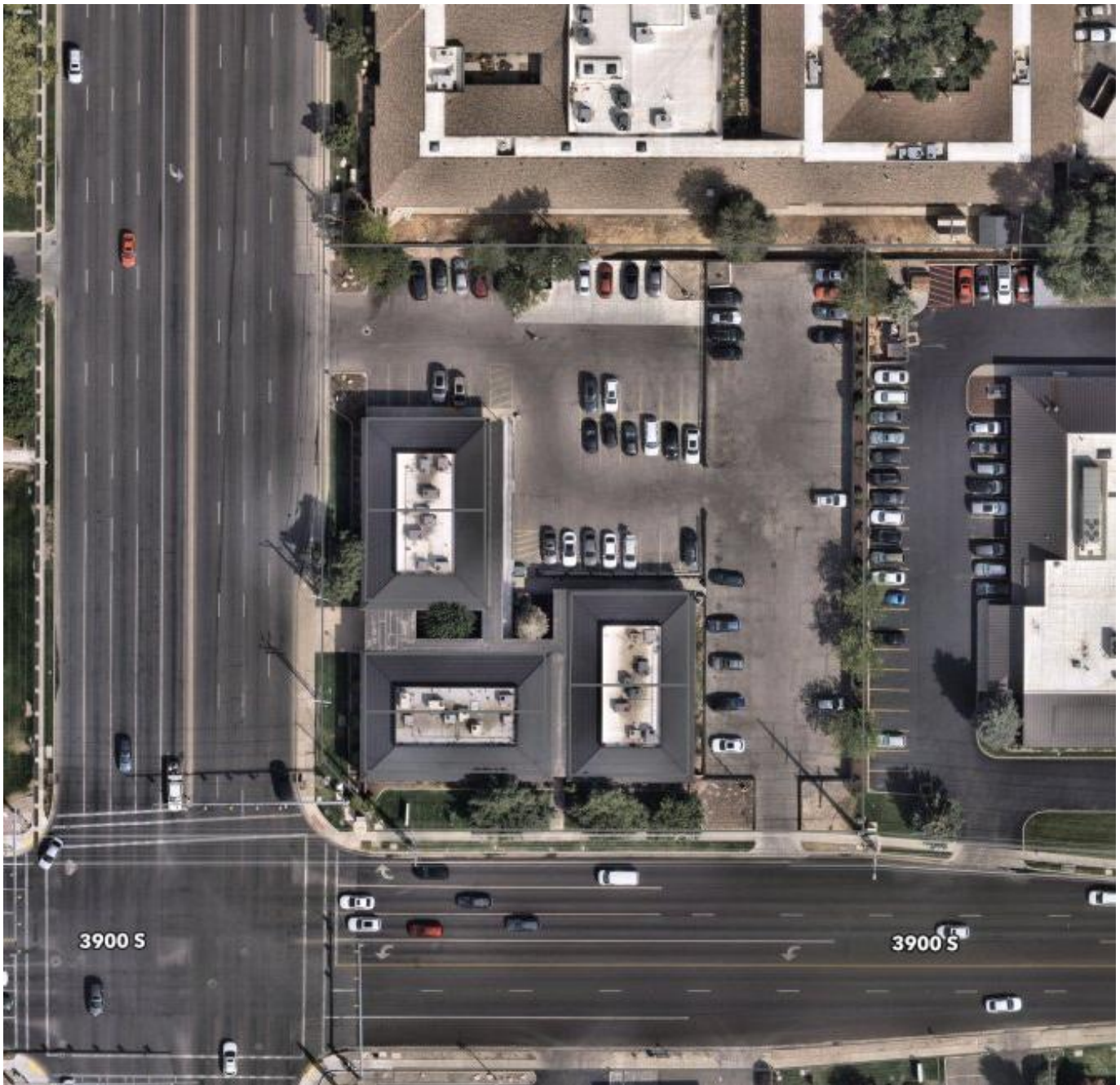
## MODEL MOTION:

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- I move that the Planning Commission approve application number CU-25-009, with the conditions that only business-office use will be allowed at the location, and no outcall services will occur at this location. And the applicant shall work with the property owner to provide a plan of action to re-stripe the parking lot and have one (1) year to complete the work.

## **SUPPORTING DOCUMENTS:**

- Aerial Imagery
- Operation Plan
- Office Floor Plan



Operation plan for the business office of Diamond Sapphire Escorts, located at 715 E 3900 S, Suite 200A, Millcreek Utah 84107.

The services that will take place at the above address are as follows.

1. Maintain employee/independent contractor records and contracts.
2. Maintain financial records, this shall be done by the software we use to book clients and enter payments. Diamond Sapphire Escorts employs an outside accountant to run our P & L's and file taxes.
3. Answer texts, emails and phone calls from clients wanting to book services with the outcall providers.
4. Verify clients through our various programs.
5. Call outcall providers to inform them at what time and where they are meeting the client.

The business office is for the above uses only.

The office will be staffed with one licensed person during all hours the outcall providers are working. This employee shall be licensed as a Booker through Unified Police.

Diamond Sapphire has no signs advertising the business or its services.

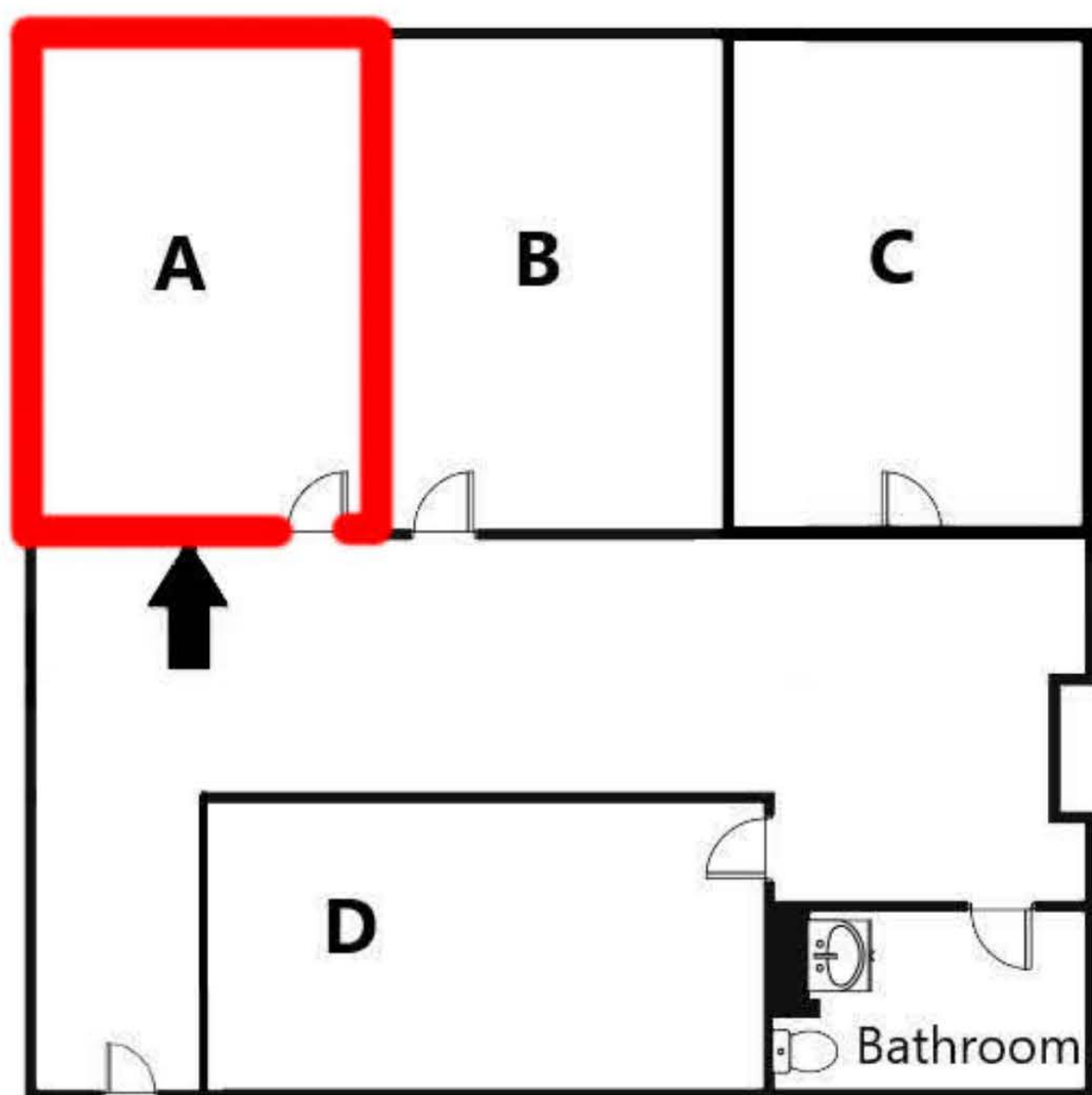
All outcall providers are contacted by phone to give them their client information and appointment location.

All outcall providers are licensed through unified police as SOB outcall providers. To be licensed as an SOB Outcall Provider, you must turn in fingerprints, background check, passport photo and a health check from the health department to unified police. The license must be renewed yearly.

Clients are never at the office; there are never any in-person bookings.

Bookers stay in contact by text with the outcall provider during the duration of the appointment and outcall providers are on GPS tracking during their shift.

The office does have a camera located in the space.



7th Plaza - Unit 200A





**Minutes of the  
Millcreek Planning Commission  
November 19, 2025  
5:00 p.m.  
Regular Meeting**

The Planning Commission of Millcreek, Utah, met in a regular public meeting on Wednesday, November 19, 2025, at City Hall, located at 1330 E. Chambers Avenue, Millcreek, Utah 84106. The meeting was conducted electronically and live streamed via the City's website with an option for online public comment.

**PRESENT:**

**Commissioners**

Shawn LaMar, Chair  
Victoria Reid, Vice Chair (excused)  
Steven Anderson  
Christian Larsen  
Nils Per Lofgren  
Jacob Richardson  
Diane Soule  
Dwayne Vance (excused)  
Ian Wright

**City Staff**

Elyse Sullivan, City Recorder  
Francis Lilly, Planning & Zoning Director  
Brad Sanderson, Current Planning Manager  
John Brems, City Attorney  
Sean Murray, Planner  
Zack Wendel, Planner

**Attendees:** Angelo Calacino, Brandon Biederman, Kaye Donahoe, Dan Donahoe, Council Member Thom DeSirant, Soren Simonsen, Jeremiah Clark

**REGULAR MEETING – 5:00 p.m.**

**TIME COMMENCED – 5:01 p.m.**

Chair LaMar called the meeting to order.

**1. Commission Business**

**1.1 The Jordan River Recreation Area Master Plan; Angelo Calacino, Salt Lake County**

Angelo Calacino, Salt Lake County Parks and Recreation, provided an overview of an ongoing master-planning effort for a designated segment of the Jordan River Corridor, undertaken pursuant to state legislation adopted in 2022. The legislation defines a planning area extending from State Road 201 to 5400 South and approximately 250 feet on either side of the river's centerline. The County engaged consultant PORT Urbanism, represented by Brandon Biederman, to lead the planning process. The project team has been working collaboratively with Millcreek City's planning staff as well as the four other jurisdictions within the study area—Taylorsville, West Valley City, Murray, and South Salt Lake—and is presenting the plan to each city's planning commission. The purpose of the presentation is to inform Millcreek of the work completed to date, outline next steps, and encourage the city to consider adopting the final plan as part of its general plan or parks and recreation plan to help guide future development along its portion of the Jordan River.

Brandon Biederman, PORT Urbanism, presented an overview of the Jordan River Corridor Master Plan effort, emphasizing that this was an introductory briefing on the plan’s purpose, work completed to date, and upcoming steps. Salt Lake County hired his firm—an urban design and landscape architecture consultancy—along with hydrological, ecological, and operations experts, to prepare the plan mandated by state legislation for the river segment between SR-201 and 5400 South. The team completed extensive public engagement and site analysis in 2024, gathering community input through events, workshops, and geolocated comments. In mid-2025, they began the plan development phase, meeting with Millcreek and the four other cities in the corridor, as well as technical agencies such as the U.S. Army Corps, Division of Forestry, Fire and State Lands, and County Flood Control, to align goals and coordinate work.

From this engagement, the project team refined the plan’s key priorities: active transportation and access, ecological restoration, recreational enhancements, safety and management improvements, and coordinated maintenance and governance. They developed system-wide goals for connected communities, healthier river corridors, expanded recreational opportunities, equitable public spaces, and cohesive operations, drawing from local plans and jurisdictional priorities. Biederman outlined seven thematic river segments and described conceptual improvements for each, including dual-sided trail networks, restored river meanders, wetland enhancement, new access points, safety improvements, and expanded park amenities. Several proposed projects directly affect Millcreek’s portion of the corridor.

He concluded by noting that the team will continue outreach to remaining jurisdictions, present to the Jordan River Commission, refine the master plan into full report form for early 2026, and launch a public-facing website with plan materials and online feedback opportunities. The planning team hopes cities, including Millcreek, will ultimately consider adopting the finalized plan into their general or parks and recreation plans.

Commissioner Wright asked if this was being promoted to the public. Biederman said there was public engagement but now it is with the cities. Commissioner Larsen appreciated attention to safety and access on 3300 S. Chair LaMar asked about the connection to the Jordan River Commission (JRC). Calacino said the county was working with JRC as a partner, as well as other entities. Chair LaMar asked about the 250 yard designation. Biederman clarified that, while he could not speak for the legislature’s reasoning behind defining the project area as 250 yards on either side of the river, the planning team has treated that boundary primarily as a “focus area.” In practice, their work centers on publicly controlled lands within that zone—primarily County property, along with certain State-owned parcels, including the riverbed itself. Recommendations are generally limited to these publicly owned areas. Only in cases where a project would require an easement or similar access would the plan extend beyond public land, and any such needs would be clearly identified as specific implementation requirements.

Soren Simonson, Executive Director of the Jordan River Commission, explained the origins and purpose of the Jordan River Recreation Area designation. Created in 2018 through legislation authored by then Representative Mike Winder, the program was designed primarily as a funding mechanism to support improvements along the river corridor. Its inception coincided with statewide efforts to restructure homelessness services and the opening of the Pamela Atkinson Homeless Resource Center in South Salt Lake. The

legislation initially focused on the stretch of river between 4500 South and 2100 South—roughly a one- to two-mile buffer around the resource center—to help mitigate associated impacts through capital improvements, programming, and related investments. Over time, the designated area was expanded south to 5400 South, and additional legislative appropriations have supplemented the program.

Simonson emphasized that the recreation area does not change local jurisdiction; Millcreek and other cities and counties along the river retain full authority over their sections. The program simply provides financial support for projects and partnerships coordinated through the Jordan River Commission. Annual funding is modest—about \$1.25 million across the entire 50-mile river corridor—though one-time appropriations have occasionally increased available resources. The Commission continues to explore additional funding avenues to strengthen the program’s impact.

Chair LaMar requested wayfinding signs on the river itself for kayakers and more for bikers on the trail.

## **1.2 Discussion on 900 East Survey Results and Potential Future Land Use Map Amendments**

Sean Murray provided an overview of the city’s preliminary analysis of development pressures along the 900 East corridor, explaining that mismatches between the future land use map, existing zoning, and current on-the-ground uses have created confusion and complicated decision-making. In response, the City Council directed planning staff to conduct a holistic review of the corridor, supported by a public survey mailed to approximately 1,650 residents and supplemented by an online interactive map and two “Chat with a Planner” events. Staff received 98 written survey responses and additional online input, revealing consistent themes: strong opposition to additional high-density housing; concerns about traffic volume, speeding, and pedestrian safety; appreciation for small local businesses and walkability; and interest in more attainable “starter” housing and improved or expanded open space.

Murray summarized data staff reviewed alongside the public feedback, including transit ridership patterns on the 209 bus route, traffic counts from both Millcreek and UDOT, and examples of land-use inconsistencies that prompted the study, such as properties zoned commercially but designated for low-density neighborhoods in the future land use map while currently operating as multifamily housing. Additional data, including crime and pedestrian accident reports, will be incorporated as staff continues its analysis. Looking ahead, Murray emphasized that any changes to the future land use map would move through a full public process, including community councils, the Planning Commission, and the City Council. Staff is also considering whether the City should create a new land-use category to fill the significant gap between low-density Neighborhood 1 (up to 6 units per acre) and medium-density Neighborhood 2 (up to 18 units per acre), an idea intended to better reflect conditions and expectations along the corridor.

Commissioner Wright asked if there was pushback or positive feedback from the public. Murray said the open ended questions invited varied feedback, some did not want more density, and some wanted more safety improvements. He noted there was only about a 5% response rate to the survey.

Francis Lilly presented on completed projects on 900 E since 2018. The varied projects were at 911 E Fairclough, 3672 S 900 E, 4240 S 900 E, 876 E Rowley Drive, 847 E 4500 S, 877 E 4500 S, 4576 S 900 E, and 4137 S 900 E. He referenced four other projects under construction.

Dan Donahoe, Millcreek Community Council, wondered about the people who responded to the survey and asked if there were secondary questions to determine the groups of people who responded. Murray noted the survey did not inquire about personal data.

Jeremiah Clark, Millcreek Community Council, asked about the difficulty leasing commercial space at 3672 S 900 E. Lilly said the rent price kept business out of the unit. Clark asked about the diversity of zoning along 900 E. Lilly responded that development pressures and economic conditions changed over time which drove the varied zoning. Clark wondered if there was currently pressure for high density housing on 900 E and if there was resistance from existing residents. Murray said that was part of the reason to change the Future Land Use Map, but there was also a lot of discrepancies with zoning/plans. Lilly noted developers wanted townhomes on 900 E, and some residents did and some did not want to maximize their property.

Commissioner Larsen said higher density was more appropriate near intersections, public transit, grocery, and parks, and 900 E was conducive to that. He was interested in increasing Neighborhood 1 to a 1.5 concept and mixed-use/live-work units near intersections and higher density. He wanted studies done for traffic calming measures. He pushed for village center concepts at 3300 S, 3900 S, or 4500 S and 900 E.

Commissioner Soule was surprised about the public's thoughts regarding biking safety on 900 E since it was just widened and improved. She felt there was opportunity for village districts on the major intersections. She expressed enthusiasm for the 900 East corridor study, noting that it intersects many issues the Planning Commission regularly discusses, including mixed-use development, housing diversity, and neighborhood character. She highlighted opportunities—particularly between Elgin and 3900 South—for alternative housing forms on deep lots as they turn over, such as small, detached cottages or courtyard homes around 1,000 square feet, which could offer affordable ownership options for younger residents without introducing large townhome projects. She supported concentrating higher density near major intersections while considering a new mid-range residential designation for properties fronting 900 East that are currently single-family but unlikely to remain viable as traffic increases.

Commissioner Soule also emphasized the need to communicate clearly with residents about land ownership, especially regarding the popular “horse property,” which is not City-owned, and suggested that additional green space—potentially in collaboration with the County—could address repeated community requests. Drawing from sessions at the APA conference, she encouraged the city to explore corridor-wide design strategies that promote walkability, local businesses, and community gathering spaces, as well as playful child-friendly elements such as interactive bus stops or enhanced sidewalks. She raised concerns about the long-term viability of ground-floor commercial spaces in mixed-use developments and recommended gathering data on occupancy rates to understand whether these requirements remain effective or create safety and maintenance issues when storefronts sit vacant. Commissioner Soule also relayed resident frustrations about visual blight at certain intersections—such as auto



businesses storing junk cars—and asked how the city might address such conditions. Finally, she referenced complaints about inadequate parking space for a Pilates studio operating on the ground floor of a mixed-use building, suggesting the city review parking requirements to ensure that commercial tenants with higher customer turnover do not push overflow parking onto adjacent residential streets.

Commissioner Richardson asked how the safety recommendations would be incorporated in the General Plan. Lilly said staff would research to see if there was a mismatch with reality and perception. Speed counts were being conducted on 900 E. Commissioner Richardson felt there were two sides to the comments in the survey, for and against enhancements. He felt 900 E was a good place to add some density. He brought up looking at existing open spaces in the area with the county's property. Murray was not sure of any final plans happening with the county's property. It was noted that Scott's Avenue Park was underutilized.

Commissioner Anderson asked if a traffic study had been done since the 900 E improvements. Murray said there had not been a holistic study of the length of 900 E. He mentioned adding lighted crosswalks. Murray brought up shifting all of the neighborhood designations up instead of creating a 1.5.

Chair LaMar brought up neighborhood commercial on the bigger intersections. Murray said staff observed increasing pressure on underdeveloped or vacant commercial lots, where property owners often request townhomes or apartments despite the Future Land Use Map designating these sites as purely commercial. The challenge lies in balancing strict adherence to commercial designation—which may result in vacant or underutilized lots—versus allowing residential or mixed-use development. Past experiences, such as a property that required multiple discussions before retaining its commercial use, illustrate the complexity of enforcing commercial intent versus responding to market realities. Staff suggested a nuanced approach: prioritizing commercial or mixed-use development near key intersections where pedestrian traffic supports business success, while allowing higher-density residential uses further from these “hot spots.” This approach would require strategic, intentional planning to ensure mixed-use areas are viable, avoiding locations where commercial uses are unlikely to succeed.

### **1.3 Approval of October 15, 2025, Regular Meeting Minutes**

**Chair LaMar moved to approve the minutes as presented in the packet. Commissioner Larsen seconded. Chair LaMar called for the vote. Commissioner Anderson voted yes, Chair LaMar voted yes, Commissioner Larsen voted yes, Commissioner Lofgren voted yes, Commissioner Richardson voted yes, Commissioner Soule voted yes, and Commissioner Wright voted yes. The motion passed unanimously.**

### **1.4 Updates from the Planning Director**

Francis Lilly reminded the commission about an appreciation lunch on December 9<sup>th</sup> and reviewed upcoming items for the December commission meeting.

## **2. Calendar of Upcoming Meetings**

- City Council Mtg. 11/24/25 7:00 p.m.
- Mt. Olympus Community Council Mtg., 12/1/25, 6:00 p.m.

- Millcreek Community Council Mtg., 12/2/25, 6:30 p.m.
- Canyon Rim Citizens Association Mtg., 12/3/25, 7:00 p.m.
- East Mill Creek Community Council Mtg., 12/4/25, 6:30 p.m.
- City Council Mtg. 12/8/25 7:00 p.m.
- Historic Preservation Commission Mtg., 12/11/25, 6:00 p.m.
- Planning Commission Mtg. 12/17/25, 5:00 p.m.

**ADJOURNED:** Commissioner Lofgren moved to adjourn the meeting at 6:54p.m. Commissioner Larsen seconded. Chair LaMar called for the vote. Commissioner Anderson voted yes, Chair LaMar voted yes, Commissioner Larsen voted yes, Commissioner Lofgren voted yes, Commissioner Richardson voted yes, Commissioner Soule voted yes, and Commissioner Wright voted yes. The motion passed unanimously.

**APPROVED:** \_\_\_\_\_ **Date**  
Shawn LaMar, Chair

**Attest:** \_\_\_\_\_  
Elyse Sullivan, Recorder