



UTAH WATERFOWL ASSOCIATION

Northpoint Small Area Maps and Narrative

Submitted via email

3.2.23

To: Salt Lake City Mayor Mendenhall, Salt Lake City Council, and Salt Lake County Regional Development

Re: Improvements Needed in Northpoint Small Area Plan – Highlighting Conservation Values

Dear Mayor Mendenhall, Salt Lake City Council members, Dina Blaes, Director of the Office of Regional Development and Helen Peters, Director Salt Lake County Regional Planning & Transportation:

Please accept and fully consider the enclosed maps and comments on behalf of Audubon Rockies, FRIENDS of Great Salt Lake, Utah Waterfowl Association, and the Jordan River Commission. Collectively, we appreciate the efforts of the Mayoral office, Planning Commission, and City Council to develop these lands thoughtfully as the state of Utah experiences unprecedented growth. With that in mind, we respectfully submit these comments and associated maps for your consideration as you develop a more robust Northpoint Small Area Plan. The unique scenic qualities of these lands are not only highly valued by residents but are a strong attractant to new potential residents. Great Salt Lake wetlands and riparian areas and wetlands of the Jordan River not only provide a recreational asset and moneys for the City and County but are incredibly important for maintaining water quality and sustaining the ecological integrity of habitat for resident and migrating wildlife. Agricultural lands support the economy, also support wildlife, and are deeply part of Utah's culture. Thus, efforts are needed to preserve agricultural lands, healthy wildlife habitat, and functioning ecosystems. In addition to increasing property value¹, these areas will increase the 2200 West Corridor's resiliency to drought and floods. The state of Utah has been proactive in efforts related to addressing the declining condition of Great Salt Lake. We hope that the following content, which highlights the conservation areas - wetlands and uplands of the Great Salt Lake shoreline – will similarly result in your leadership to preserve these resources and the traditional uses of the landscape.

¹ Review of the impact of urban parks and green spaces on residence prices in the environmental health context. 2022. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9490231>

Maps of Important Conservation Areas

Figure 1. GSL Wetlands Relative to the Northpoint Small Area. Juxtaposition of ecologically sensitive areas of the Great Salt Lake ecosystem (wetlands and uplands of the Southshore area) and the developed landscape are illustrated.

Utah Geological Survey wetlands data (shown in greenish yellow) were used to illustrate the close proximity of GSL wetlands to the Northpoint Small Area plan area and the rest of the Salt Lake City boundary (<https://gis.utah.gov/data/water/wetlands/> 2021). These wetland data are not indicative of wetland jurisdiction designation, but are important for showing habitat identification and hydrologic connectivity with Great Salt Lake. U.S. Fish and Wildlife National Wetlands Inventory (NWI) data were validated by UGS by examining aerial imagery, on-the-ground assessment and field verifying to improve accuracy of the NWI data.

Among the areas of interest to our organizations is the proposed Shoreline Heritage Area (SHA), located within the area being considered in the Northpoint Small Area Plan. The SHA begins in the northwest corner of Salt Lake City's Northwest Quadrant and includes the entire Natural Area designated in the Salt Lake City Northwest Quadrant Master Plan (adopted 2016, <http://www.slcdocs.com/Planning/Projects/NorthwestQ/NWQ.pdf>).

- The proposed SHA, outlined in orange with white diagonal lines, is primarily composed of privately held land used for agriculture, duck clubs and other wildlife conservation, and a small amount of residential land. Some of the land is owned by the Federal government. Taking actions to preserve the natural character of the area, its traditional uses and open space, are critical. We acknowledge that there are vested property rights within the area that need to be respected. We propose the City develop financially incentivized land preservation tools that maintain the open space and historic cultural heritage of these identified lands within the Northpoint Small Planning Area. An example tool is a Transfer of Development Rights Program, although there are additional good land preservation tools prescribed in the Northpoint Small Area Plan.
- The Natural Area, outlined in green, is nested between conservation lands to the west and duck club conservation and agricultural lands to the north, and creates a boundary between sensitive lands and the Utah Inland Port Authority (outlined in black).
- The Natural Area includes many wetland features formed by an abandoned portion of an ancient Jordan River delta that are hydrologically connected to Great Salt Lake.
- From there, the SHA goes through wetlands managed for duck hunting and connects in an eastward direction outside the north perimeter of Salt Lake City International Airport with a portion of the Northpoint Small Area, outlined in brown.
- From the Northpoint Small Area, the SHA continues in a northwestern direction connecting with uplands that are largely agricultural and surrounded by prime Great Salt Lake wetland habitat on the western and northern sides and is adjacent to the Jordan River and Legacy Nature Preserve

on the eastern side. This portion is mostly within Salt Lake County and already designated part of the SHA of the Salt Lake County West General Plan (2022)².

- The green cross-hatched areas in the Northpoint Small Area indicate areas where Land Preservation Tools identified in Chapter 4 of the Northpoint Small Area Plan could be applied to conserve land to implement low-impact development to neighboring communities and transition to an ecologically relevant buffer to Great Salt Lake wetlands.

Figure 2. Great Salt Lake Shoreline Heritage Area.

- These areas are of local and global conservation value. NGO conservation areas are colored purple, and duck club conservation areas are within the green area. It is important to note that agricultural use is located throughout both areas, and that both areas have significant greenbelt status.
 - a) *Whether NGO, duck club, or agricultural, all serve an important role in sustaining the ecological health and cultural heritage of the area. The conservation and duck club areas together contain approximately 20,000 acres of managed Great Salt Lake wetlands of different types.*
 - b) *BirdLife International has identified over 13,600 [Important Bird and Biodiversity Areas](#) (IBAs) worldwide. Five of them are designated at each bay of Great Salt Lake, including Farmington Bay and its wetlands. These IBAs form the core of a wider network of [Key Biodiversity Areas \(KBAs\)](#)—critically important sites for the persistence of global plant and animal diversity.*
 - c) *One key function of Great Salt Lake wetlands and nearby uplands is all the habitat resources they provide the hundreds of avian species that depend on them. Each year, birds come to the lake by the millions and as we are witness to habitat loss on the lake due to long-term drought and habitat loss, managed wetlands become an increasingly critical resource for migrating and nesting birds. These wetlands contribute to the **Western Hemispheric Shorebird Reserve Designation of Great Salt Lake.***
 - d) *Many of the wetlands are also designated by the 2009 Utah Legislature as a **Migratory Bird Production Area (MBPA)**. As Max Malmquist, Audubon’s Saline Lakes Program, wrote in the March 16th 2021 Audubon Rockies Newsletter: “The 2021 amendment of this law sets further protections of MBPAs: “The act calls for counties in which MBPAs are located to encourage the continuity, development, and viability of these areas, and gives them the “highest priority of use” status, which highlights their importance to migratory birds. **Many MBPAs are directly adjacent to Great Salt Lake, are essential in maintaining continuity among wetlands, and play a key role in water inflows to the lake.**”*

² The Shoreline Heritage Area (SHA) originally designated in the Salt Lake County West General Plan (SLCWGP, adopted 2022) “consists of the Great Salt Lake and wetlands, agricultural lands, shoreline and waterfowl habitat, and agrarian residential” (SLCWGP Plan Area Map, Figure 1.3, pg. 7, and pg. 22).

Additional Ecological Considerations

Components of the area being considered in the Northpoint Small Area Plan is central to the continued productivity and ecological value of Great Salt Lake wetlands and the riparian areas and wetlands of the Jordan River. By preserving its existing natural character and traditional land uses in a robust plan, the outcome will:

- establish a robust natural boundary between mounting pressures of the developed landscape that burden people, wildlife and their habitat alike with unsafe air, water, noise, and light pollution
- provide a natural barrier to invasive plants and pests that threaten agricultural lands and wildlife areas
- prevent impacts to hydrological connectivity with the lake and sustains other important wetland functions such as groundwater recharge and flood attenuation
- prevent the built landscape from reaching the edge of Great Salt Lake wetlands and the lower reach of the Jordan River

The guiding principle for Ch. 6, the Natural Environment in Plan Salt Lake is to minimize impact on the natural environment (adopted 2015).

- *“Over the next 25 years, we will strive to protect and restore critical wildlife habitat, sensitive natural lands, and open space. These environments are crucial to water supply and quality and to the ecosystems that sustain us. We will work to preserve and restore riparian corridors in and around our community.”*

An improved Northpoint Small Area Plan that considers the cultural and ecological benefits of preserving the aforementioned lands will not only apply the above guiding principle, but result in a development scenario that is more resilient to changing environmental conditions and economically sound.

Landowners within the Northpoint Small Area currently zoned BP

- can utilize financially incentivized land preservation tools that maintain open space and the cultural heritage of the land.
- could participate in a Transfer of Development Rights Program, is one of many tools prescribed in the Northpoint Small Area Plan Chapter 4, pg. 45 of Plan Salt Lake, and other principles put forth in Blueprint Jordan River Refresh (2022) that maintain open space.

Land proposed for development in the Land Preservation Tools Area (green cross-hatched):

- will be entitled to review and opt for land conservation tools in Chapter 4 of the Northpoint Small Area Plan, pg. 45 of Plan Salt Lake, and other principles put forth in Blueprint Jordan River Refresh (2022).
will allow for some low-impact building, with the ultimate goal of minimizing impacts associated with built environments to nearby families and ecologically sensitive areas.

We thank you for the opportunity to comment and welcome the opportunity to work together in the future to address the challenges of balancing these various values along the 2200 West Corridor

Sincerely,

Heidi M. Hoven, PhD
Conservation Specialist, Gillmor Sanctuary
Audubon Rockies
231 W 800 S, Ste E
Salt Lake City, UT 84101
Heidi.Hoven@audubon.org
rockies.audubon.org/gillmor

Lynn de Freitas
Executive Director
FRIENDS of Great Salt Lake
150 South 600 East, Suite 5D
Salt Lake City, Utah 84102
<https://www.fogsl.org/about/about-friends>

Soren Simonsen, FAIA, AICP, LEED AP
Executive Director
Jordan River Commission
PO Box 526081
Salt Lake City, UT 84152-6081
sorensimonsen@utah.gov
JordanRiverCommission.com
MyJordanRiver.org

Jack Ray
Utah Waterfowl Association
j.ray.pine@outlook.com
<https://www.facebook.com/groups/263929757011728>

Cc:

Rachel Otto
Chief of Staff
OFFICE of the MAYOR
SALT LAKE CITY CORPORATION
Rachel.Otto@slcgov.com
WWW.SLCMAYOR.COM
WWW.SLC.GOV

Councilman Darin Mano
Chair, City Council
SALT LAKE CITY CORPORATION
darin.mano@slcgov.com
WWW.SLC.GOV

Cindy Gust-Jenson
Executive Director, Office of the City Council at
SALT LAKE CITY CORPORATION
Cindy.Gust-Jenson@slcgov.com

Jason Wolf
Director of Canyons Management
2001 S. State Street S2-100
PO Box 144575
Salt Lake City, UT 84114-4575
JWolf@slco.org
<https://slco.org/regional-development/contact-us/>

Figure 1



Figure 2

