



Development Review Committee

1020 East Pioneer Road

Draper, UT 84020

STAFF REPORT

August 20, 2021

To: Jennifer Jastremsky, Zoning Administrator

Approved Date

From: Jennifer Jastremsky, AICP, Zoning Administrator/Planning Manager
801-576-6328, jennifer.jastremsky@draperutah.gov

Re: **Corner Canyon Health Centers – Permitted Use Permit Request**

Application No.: USE-075-2021
Applicant: Brad Christensen, representing Corner Canyon Health Centers
Project Location: Approximately 13020 S Fort St.
Current Zoning: R3 (Single-family, 13,000 square foot lot minimum) Zone
Acreage: Approximately 1.69 Acres (Approximately 73,616 square feet)
Request: Request for approval of a Permitted Use for Residential Facility for Persons with a Disability and a Request for Reasonable Accommodation in the R3 zone.

SUMMARY AND BACKGROUND

The subject application requests approval of a Residential Facility for Persons with a Disability (Residential Facility) pursuant to Draper City Municipal Code (DCMC) § 9-38-040 as well as a Reasonable Accommodation (Accommodation) pursuant to DCMC § 9-38-050 for use of a property approximately 1.69 acres in size located on the west side of Fort St., at approximately 13020 South Fort St. (Exhibit B). The property is currently zoned R3. The applicant is requesting that a Residential Facility and an Accommodation be approved to allow for a 15 resident group home.

The property contains one, relatively large single-family home built in 2006. While it is not currently part of a subdivision, the property owners have applied to subdivide the property



into three lots. If approved, the subdivision would create two third-acre lots in the rear half of the property and a 0.76 acre lot for the existing home.

ANALYSIS

General Plan and Zoning. The Land Use Map of the General Plan applies a Residential Low/Medium Density land use designation to the subject property (Exhibit C). This designation is characterized as follows:

Residential Low-Medium Density

| LAND USE DESCRIPTION | | | |
|---|---|---|---|
| CHARACTERISTICS | <ul style="list-style-type: none"> • Very large lot single-family neighborhoods or ranchettes allows for enhancement of Draper’s rural character • Environmentally designed clustered housing with the Suncrest and South Mountain projects being the exceptions • Some natural features and cultivated vegetation is apparent and special care is required in order to preserve those features and areas • Equestrian uses and privileges may exist in certain areas | | |
| LAND USE MIX | <table border="0"> <tr> <td> Primary <ul style="list-style-type: none"> • Single-family detached homes </td> <td> Secondary <ul style="list-style-type: none"> • Parks • Open space • Churches • Schools </td> </tr> </table> | Primary <ul style="list-style-type: none"> • Single-family detached homes | Secondary <ul style="list-style-type: none"> • Parks • Open space • Churches • Schools |
| Primary <ul style="list-style-type: none"> • Single-family detached homes | Secondary <ul style="list-style-type: none"> • Parks • Open space • Churches • Schools | | |
| DENSITY | <ul style="list-style-type: none"> • Density range: up to 2 dwelling units per acre • Reduction for non-buildable areas | | |
| COMPATIBLE ZONING | <ul style="list-style-type: none"> • Residential Agricultural (RA1) • Residential Agricultural (RA2) • Single-family Residential Hillside (RH) • Master Planned Community (MPC) | | |
| OTHER CRITERIA | <ul style="list-style-type: none"> • Increased densities within equestrian areas may be allowed only with compliance to specified performance standards and impact mitigation measures • Buffers and transitions around existing low-density single-family residences may consist of open space/retention areas, lots that are pie-shaped or otherwise larger than standard sized lots or a combination of these and other appropriate design techniques | | |

The property is zoned R3, allowing approximately three dwelling units per acre (Exhibit D). According to DCMC § 9-8-020 the purpose of the R3 zone is to “*permit medium density residential development without special mitigation requirements. This zone is intended to provide incentives to foster residential development with little impact on its surroundings and on municipal services, and to generally preserve the semirural character called for in the density element of the general plan.*” The property abuts the R3 zone (Corner Canyon High School) to



the west, the RA2 (Residential Agricultural, 20,000 square foot lot minimum) zone to the south and east, and the RA1 (Residential Agricultural, 40,000 square foot lot minimum) zone to the north.

1. Residential Facilities Permitted Use Request and Criteria for Decision.

The applicant is requesting to operate a Residential Facility on the property. The applicant has stated that the residents will have mental health and substance abuse impairments. This use is a permitted use under the R3 zoning classification, subject to a Permitted Use Permit and a resident census limit of 8. In his application and supporting materials, the applicant states the facility is licensed by the State of Utah as a “residential treatment program”. Per DCMC § 9-3-040, a Residential Facility is a residence licensed by the Utah Department of Human Services under Utah Code Annotated Title 62A, Chapter 2, such as a “residential treatment program”. As such, the property and its proposed use meets the DCMC definition of a Residential Facility for Persons with a Disability.

9-3-040: DEFINITIONS:

RESIDENTIAL FACILITY FOR PERSONS WITH A DISABILITY: A residence in which more than one person with a disability resides and which is licensed or certified by:

- A. The Utah department of human services under Utah Code Annotated title 62A, chapter 2, licensure of programs and facilities; or*
- B. The Utah department of health under Utah Code Annotated title 26, chapter 21, health care facility licensing and inspection act.*

With respect to such facilities, DCMC § 9-38-040 provides, in pertinent part:

B. Residential Facilities for Persons with a Disability:

- 1. The facility shall comply with all building, safety and health regulations applicable to similar structures.*
- 2. The facility must be able to be used as a residential facility for persons with a disability without fundamental alterations that would change the structure's residential character or negatively impact the character of the immediate neighborhood.*
- 3. The facility shall be limited to eight (8) occupants, exclusive of staff.¹*
- 4. If the facility is housing persons whose disability is substance abuse related and is located within five hundred feet (500') of a school, a security plan satisfactory to local law enforcement officials must be submitted and include twenty four (24) hour supervision of residents and other twenty four (24) hour security measures.*

¹ The DCMC limits Residential Facilities to a maximum of eight residents, but does have allowances for an applicant to request an Accommodation. The applicant has requested an Accommodation for additional residents, and that request is analyzed further in this report.

- C. No Dangerous Persons Permitted: No residential facility shall be made available to an individual whose tenancy would:*
- 1. Constitute a direct threat to the health or safety of other individuals; or*
 - 2. Result in substantial physical damage to the property of others.*
- D. License and Certification: Prior to occupancy of any residential facility, the person or entity operating the facility shall:*
- 1. Provide to the city a copy of any license or certification required by the Utah state department of health or the Utah state department of human services; and*
 - 2. Certify in a sworn statement that no person will reside or remain in the facility whose tenancy would:*
 - a. Constitute a direct threat to the health or safety of other individuals; or*
 - b. Result in substantial physical damage to the property of others.*

Application of DCMC § 9-38-040.

The applicant has stated there will be 13 non-resident staff persons on the premises, none of whom are expected to reside at or in the facility. The staff group is made up of monitoring staff, directors, assistants, therapists, chef, and administrative staff. The applicant anticipates up to one visitor per day. The property is capable of parking up to 17 vehicles. The garage can house 5 cars, while the driveway can accommodate 4 cars without impeding the use of the garage. In addition, the applicant has added 8 parking spaces along the side of the property. As such, the facility complies with DCMC § 9-25-100 which requires 1 parking space per 2 residential units within Residential Facilities. As such, and for additional reasons described herein, I do not anticipate the Residential Facility would require any on-street parking.

The DCMC requires Residential Facilities to comply with building, safety, and health regulations. The Draper City Building and Fire Divisions have viewed the application for compliance with applicable codes (Exhibit A). The applicant will have to provide proof of outside agency approvals prior to obtaining a business license.

The DCMC prohibits Residential Facilities from making alterations to the residential character of a structure proposed for such use, and the applicant has not modified the outside of the home. The home itself is relatively large—according to the building permit issued on October 2, 2006, the home is 7,733 square feet in size, and includes a 1,560 square foot garage. The applicant has submitted photographs, and drawings that appear to demonstrate the residence has adequate interior kitchen, bedroom, bathroom and associated facilities to accommodate a resident census of eight. The Residential Facility is located on a large, 1.69 acre lot and is similarly situated to other residences on similar lots in the immediate vicinity (Exhibit B). The applicant has installed fencing to shield the home and activities taking place on the property from nearby residential uses. The surrounding zoning is R3, RA1 or RA2. The applicant did pave eight parking spaces within the side yard of the home. But while the applicant added striping to denote parking spaces in this area,

paved parking areas in and of themselves are not unusual in residential areas. I find that the proposed Residential Facility does not have fundamental alterations that would change the structure's residential character or negatively impact the character of the immediate neighborhood.

The property is located within 500-feet of a school (Exhibit E). The DCMC requires a Residential Facility to provide a security plan when located that close to a school. The applicant provided a security plan (Exhibit F). The Draper City Police Department reviewed the security plan and found it satisfactory (Exhibit A). The plan includes 24-hour supervision, camera surveillance, provision of emergency services when needed, and urine analysis testing.

The applicant has provided a sworn statement that no person will reside or remain in the facility who would constitute a direct threat to the health or safety of other individuals or result in substantial physical damage to the property of others (Exhibit G). In addition, the applicant has provided a sworn statement that the proposed use is not defined as Custodial Care under the International Building Code (IBC) as required by the Building Division (Exhibit H).

In this regard I have carefully reviewed the briefing and materials submitted by certain Fort St. neighbors who oppose the application, as well as the letters and materials submitted by the applicant. I acknowledge the neighbors' argument that the Residential Facility should not be approved because of what they characterize as its "commercial" nature. However, I do not find that the DCMC imposes any limitations on arguably "commercial" facilities as long as they meet the conditions imposed by DCMC § 9-38-040. Indeed, by requiring licensure of the facility by the Utah State Department of Health or the Utah State Department of Human Services, the DCMC seems to contemplate that such facilities will have certain commercial aspects. For that and for the additional reasons set forth more fully herein, I do not find that I can deny the application for the Residential Facility even though it may have some commercial characteristics. Ultimately, it is a residential facility that meets the definition of "Residential Facility for Persons with a Disability" under DCMC § 9-3-040, as indicated above.

Accordingly, for the reasons summarized above I find the proposed Residential Facility complies with the DCMC and so the application for a Residential Facility should be approved.

2. Reasonable Accommodation Request and Criteria for Decision.

The applicant has also applied for an Accommodation to allow a census of up to 15 residents at the facility. As noted above, DCMC § 9-38-040(B)(3) would limit the Residential Facility to eight residents, but also allows an applicant to request an Accommodation for more. The definitions provided in DCMC § 9-3-040 define an Accommodation as follows:

9-3-040: DEFINITIONS:

REASONABLE ACCOMMODATION: A change in a rule, policy, practice, or service necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling. As used in this definition:

- *Equal Opportunity: Achieving equal results as between a person with a disability and a nondisabled person.*
- *Necessary: The applicant must show that, but for the accommodation, one or more persons with a disability likely will be denied an equal opportunity to enjoy housing of their choice.*
- *Reasonable: A requested accommodation will not undermine the legitimate purposes of existing zoning regulations notwithstanding the benefit that the accommodation would provide to a person with a disability.*

In addition to the “Definitions” quoted above, DCMC § 9-38-050 imposes similar standards on which review of an application for Accommodation must be based, in pertinent part as follows:

- A. *Reasonable Accommodation Required: None of the requirements of this chapter shall be interpreted to limit any reasonable accommodation necessary to allow the establishment or occupancy of a residential facility for persons with a disability.*
- B. *Application: Any person or entity wanting a reasonable accommodation shall make application to the zoning administrator and shall articulate in writing the nature of the requested accommodation and the basis for the request.*
- C. *Decision: The zoning administrator shall render a decision on each application for a reasonable accommodation within thirty (30) days. The decision shall be based on evidence of record demonstrating:*
 - 1. *The requested accommodation will not undermine the legitimate purposes of existing zoning regulations notwithstanding the benefit that the accommodation would provide to a person with a disability;*
 - 2. *That, but for the accommodation, one or more persons with a disability likely will be denied an equal opportunity to enjoy housing of their choice; and*
 - 3. *That equal results will be achieved as between the person with a disability requesting the accommodation and a nondisabled person.*

Application of Reasonable Accommodation Criteria.

As set forth above, I have carefully reviewed the materials and briefing submitted by the Fort St. neighbors who oppose the applications. I have noted and considered the authorities and arguments based thereon which seem to primarily invoke the standards and requirements of the Federal Fair Housing Act (FHA) and associated case-law. However, I am neither trained in the law, nor tasked with the interpretation of legal authorities—I view my role as primarily administrative in nature. And while I understand that the City

must comply with the FHA in its treatment of disabled persons, I believe it may also elect to be more generous to both the elderly and the disabled than strict application of the FHA would require in the adoption of city ordinance. While there is some overlap in general principles, it appears the City has been more generous than the FHA would require through the adoption of the ordinances at issue. I also note that the applicant relies primarily on the DCMC and does not appear to invoke the FHA in seeking approval of the application.

Accordingly, while acknowledging the neighbors' arguments, I must analyze the application for compliance with standards imposed by the DCMC. That analysis follows:

Is There Evidence the Proposed Accommodation Does Not Undermine the Legitimate Purposes of the Existing Zoning:

The existing R3 zoning serves to limit development's impact on its surroundings and on municipal services, and to generally preserve the semirural character called for in the density element of the general plan. At the same time, however, the zone allows for residential facilities for the elderly, charter and high schools, and also allows certain other medical, office and retail uses with conditions, none of which are strictly semi-rural.

For the reasons set forth above, which I incorporate here by reference, I have already found that the proposed Residential Facility operating with a resident census of 8 does not negatively impact the character of the immediate neighborhood. The applicant has also submitted a letter statement from a neighbor living near a similarly situated Pioneer Road facility, owned and operated by the applicant and operating with a resident census greater than 8, which attests to a lack of adverse impacts on that neighborhood. This evidence weighs against a finding that an Accommodation of a census greater than 8 in the unmodified Residential Facility, not unlike other permitted and conditional uses, would undermine the legitimate purposes of the zoning.

In addition, the property is located on Fort St., which is classified as a Minor Collector by the City's Master Transportation Plan (Exhibit I). A Minor Collector helps filter residents from local streets and move them to arterial roadways. Because such streets act as "collectors" of local traffic, they often have more traffic than would typically be found on a local, residential neighborhood road. Given the higher level of traffic on Fort St. than a typical neighborhood, the additional traffic generated from an Accommodation would not impact the functionality of the street or other municipal services.

The property is also 1.69 acres in size, and as discussed previously, can accommodate parking up to 17 vehicles on site. Coupled with Fort St.'s classification as a minor collector, it is possible to accommodate the proposed census of residents and staff without arguably unsightly on-street parking or congestion on Fort St. itself. To further meet the intent of the DCMC and reduce any adverse impact on the neighborhood, as a condition of approval I will prohibit on street parking by any staff member, resident or guest at the Residential

Facility.

Given the evidence demonstrating a lack of adverse impact on the immediate neighborhood, the combination of uses allowed by the existing zoning, the surrounding zoning and surrounding uses, I find that the requested Accommodation for a resident census greater than 8 does not undermine the legitimate purposes of the existing zoning. To the extent required by the definition in DCMC § 9-3-040, I find the Accommodation is "reasonable" for these same reasons.

Is There Evidence that Without the Accommodation One or More Disabled Persons Will Likely be Denied an Equal Opportunity to Enjoy Housing of Their Choice:

The DCMC does not limit the number of people living within a family or a household. As defined by DCMC § 9-3-040, a family is one or more persons living together as a housekeeping unit. A Household is defined as a family who has access to common areas and common use of living and eating facilities.

9-3-040: DEFINITIONS:

FAMILY: One (1) or more persons living together as a single housekeeping unit.

HOUSEHOLD: A family living together in a single dwelling unit with common access to and common use of all living and eating areas and facilities for the preparation and serving of food within the dwelling unit.

And when it comes to Residential Facilities for the Elderly, DCMC § 9-38-040(A) does not limit the number of residents. In contrast, the DCMC does limit the census in Residential Facilities.

If I were to deny the Accommodation under the circumstances presented here, a disabled person wanting the opportunity to live in the Residential Facility would only be allowed to live with 7 other individuals regardless of their needs and individual circumstances, while a nondisabled person could choose to live in a residence with more than 8 others as that person's needs and circumstances might dictate.

In addition, the applicant has stated that there is a wait list of disabled persons desiring treatment at its other Residential Facility located at 1450 E Pioneer Rd. Absent the Accommodation, these disabled persons could be denied the opportunity to choose housing in the Residential Facility.

Accordingly, I find that but for the Accommodation in this instance, one or more persons with a disability likely will be denied an equal opportunity to enjoy housing of their choice. For these same reasons, I find that the Accommodation is "necessary" to provide these

equal opportunities as described by the Definitions.

Will the Accommodation Achieve Equal Results Between Disabled and Nondisabled Persons:

For the reasons described above, I also find that the Accommodation will achieve an equal result between the disabled and nondisabled. Granting the Accommodation results in disabled and nondisabled persons both having equal choices in communal, residential living which they can exercise as individual needs and circumstances might dictate.

Resident Census Approved

I note that the neighbors opposing the application criticize the information submitted by the applicant as to the financial and therapeutic necessity of the requested Accommodation, and request that I deny the application in its entirety. However, the DCMC does not require a showing on either element, and the neighbors do not proffer evidence or argument as to whether a particular number greater than 8 but less than 15 might alleviate their concerns with respect to the alleged adverse impacts on the neighborhood in light of the standards imposed by the DCMC. Because I do not find I can deny the application for the reasons set forth above, I have no basis, pursuant to the DCMC and the neighbor's evidence, to limit the census to a number greater than 8 but less than 15. Accordingly, in this particular case and based on the evidence presented here, I grant the Accommodation to allow up to 15 residents as requested by the applicant.

REVIEWS

Planning Division Review. The Draper City Planning Division has completed their review of the Residential Facility for Persons with a Disability and a Request for Reasonable Accommodation submission. Comments from this division, if any, can be found in Exhibit A.

Engineering and Public Works Divisions Review. The Draper City Engineering and Public Works Divisions have completed their reviews of the Residential Facility for Persons with a Disability and a Request for Reasonable Accommodation submission. Comments from these divisions, if any, can be found in Exhibit A.

Building Division Review. The Draper City Building Division has completed their review of the Residential Facility for Persons with a Disability and a Request for Reasonable Accommodation submission. Comments from this division, if any, can be found in Exhibit A.

Fire Division Review. The Draper City Fire Marshal has completed his review of the Residential Facility for Persons with a Disability and a Request for Reasonable Accommodation submission. Comments from this division, if any, can be found in Exhibit A.

Legal Division Review. The Draper City Attorney has completed his review of the Residential Facility for Persons with a Disability and a Request for Reasonable Accommodation submission. The request complies with federal and state laws and Draper City ordinances. Comments from this division, if any, can be found in Exhibit A.

Noticing. Notice has been properly issued in the manner outlined in the City and State Codes.

CONCLUSION.

For the reasons set forth above, I find the applicant has proposed a Residential Facility as defined by DCMC § 9-3-040 and that the Residential Facility complies with the criteria set forth in DCMC § 9-38-040 for approval of such a Residential Facility. Accordingly, I approve the subject application for a Residential Facility as a permitted use.

For the reasons set forth above, I find that the applicant seeks an Accommodation as defined by and in accordance with DCMC § 9-3-040, and that there is evidence in the record supporting the criteria set forth in DCMC § 9-38-050 for approval of such an Accommodation, as follows:

1. There is evidence the requested Accommodation will not undermine the legitimate purposes of existing zoning regulations notwithstanding the benefit that the accommodation would provide to a person with a disability.

2. There is evidence that, but for the Accommodation, one or more persons with a disability likely will be denied an equal opportunity to enjoy housing of their choice.
3. There is evidence that the Accommodation will allow equal results to be achieved as between persons with a disability and nondisabled persons.

Accordingly, I approve the subject application for an Accommodation to allow a census of up to 15 residents at the Residential Facility.

In addition, I find that the uses described above meet the requirements and provisions of DCMC § 9-5-070E. and are approved as permitted uses.

In doing so, I impose the following conditions of approval:

1. That all requirements of the Draper City Engineering, Public Works, Building, Planning, Business Licensing, and Fire Divisions are satisfied throughout the use of the site and the construction of all buildings on the site, including permitting.
2. That the facility will allow no more than 15 residents to live in the Residential Facility at any given time.
3. That no person or persons will reside in the facility that will be a threat to the health, safety and property of others in the area.
4. That no change is made to the exterior of the building that would fundamentally alter its residential character.
5. That the facility complies with all regulations contained in Sections 9-38-040-B through D of the Draper City Municipal Code.
6. That the facility obtains a business license from Draper City.
7. That the facility obtains Building and Fire Division inspection approvals from Draper City.
8. That the facility may not be occupied until the Utah State Department of Human Services issues a license and the city receives a copy of the same.
9. That proof of approval from outside agencies, as applicable, are provided to the city prior to business license issuance.
10. All parking shall take place on-site and no on-street parking is allowed in association with the Residential Facility.

DEVELOPMENT REVIEW COMMITTEE ACKNOWLEDGEMENT

We, the undersigned, as duly appointed members of the Draper City Development Review Committee, do acknowledge that the application which provides the subject for this staff report has been reviewed by the Committee and has been found to be appropriate for review by the Draper City Planning Commission and/or City Council.

Draper City Public Works Department

Draper City Planning Division

Draper City Fire Department

Draper City Legal Counsel

Draper City Building Division



EXHIBIT A DEPARTMENT REVIEWS

REVIEWS ARE NOT MEANT TO BE AN ALL INCLUSIVE LIST OF POSSIBLE COMMENTS OR CONDITIONS.

Planning Division Review.

1. The proposed residential facility complies with DCMC.
2. The requested reasonable accommodation complies with the three criterion of equal opportunity, necessity, and reasonableness.

Fire Division Review.

1. 2A-10BC Fire Extinguishers required. The extinguisher needs to be a serviceable type meaning metal head and metal neck. Extinguishers need to be located in a conspicuous location where they will be readily accessible and immediately available for use. Placed every 75 feet of travel. If in cabinet or not the extinguisher or cabinet needs to be mounted so that the top is not more than five (5) feet above the floor.
2. Visible Addressing Required. New and existing buildings shall have approved address numbers plainly legible and visible from the street fronting the property. These numbers shall contrast with their background.

Police Division Review.

1. I am fine with their security plan.

EXHIBIT B AERIAL MAP



**Corner Canyon Health Center
Permitted Use Permit
Aerial Map**

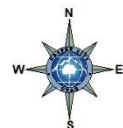


EXHIBIT C LAND USE MAP

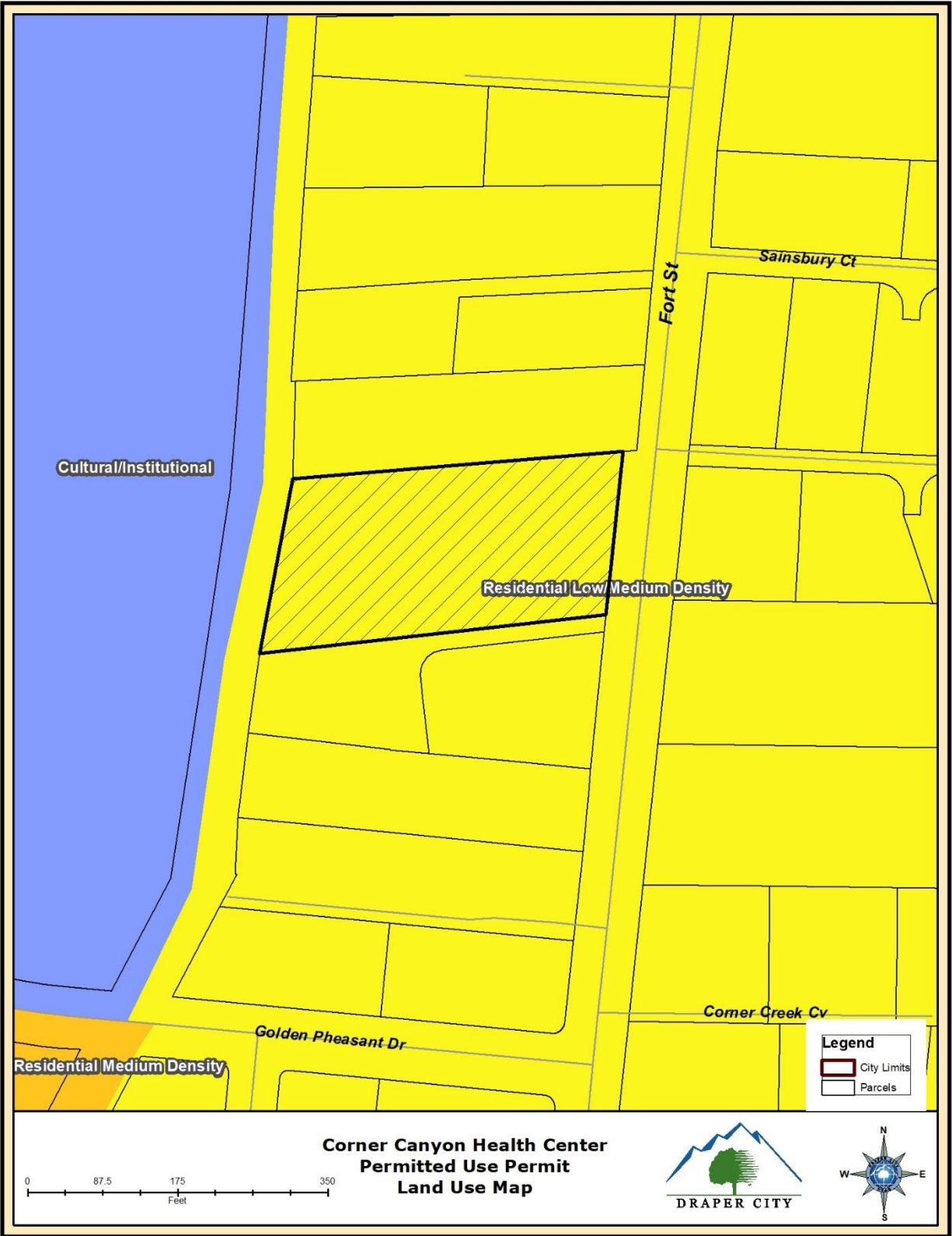
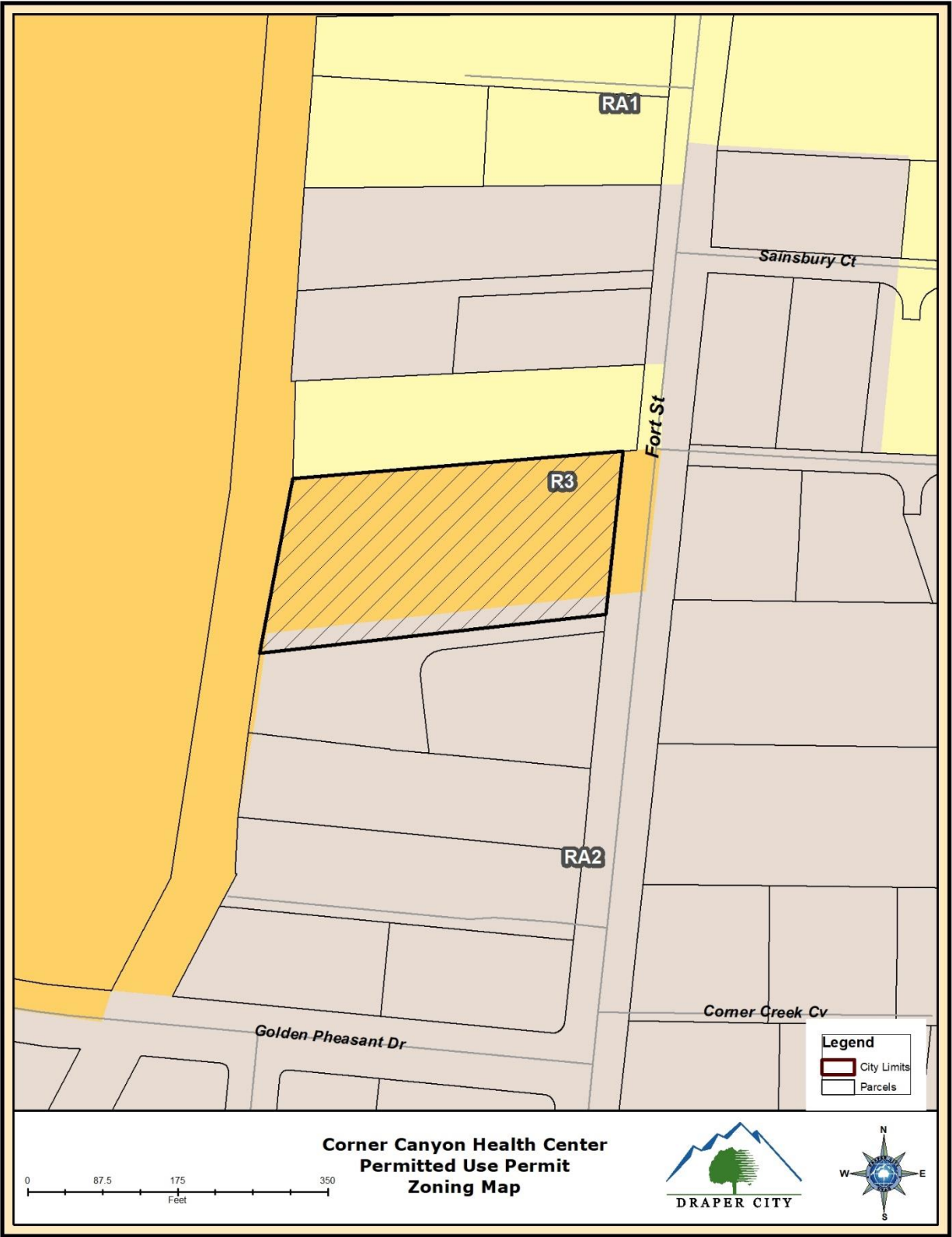


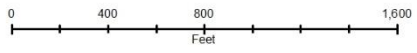
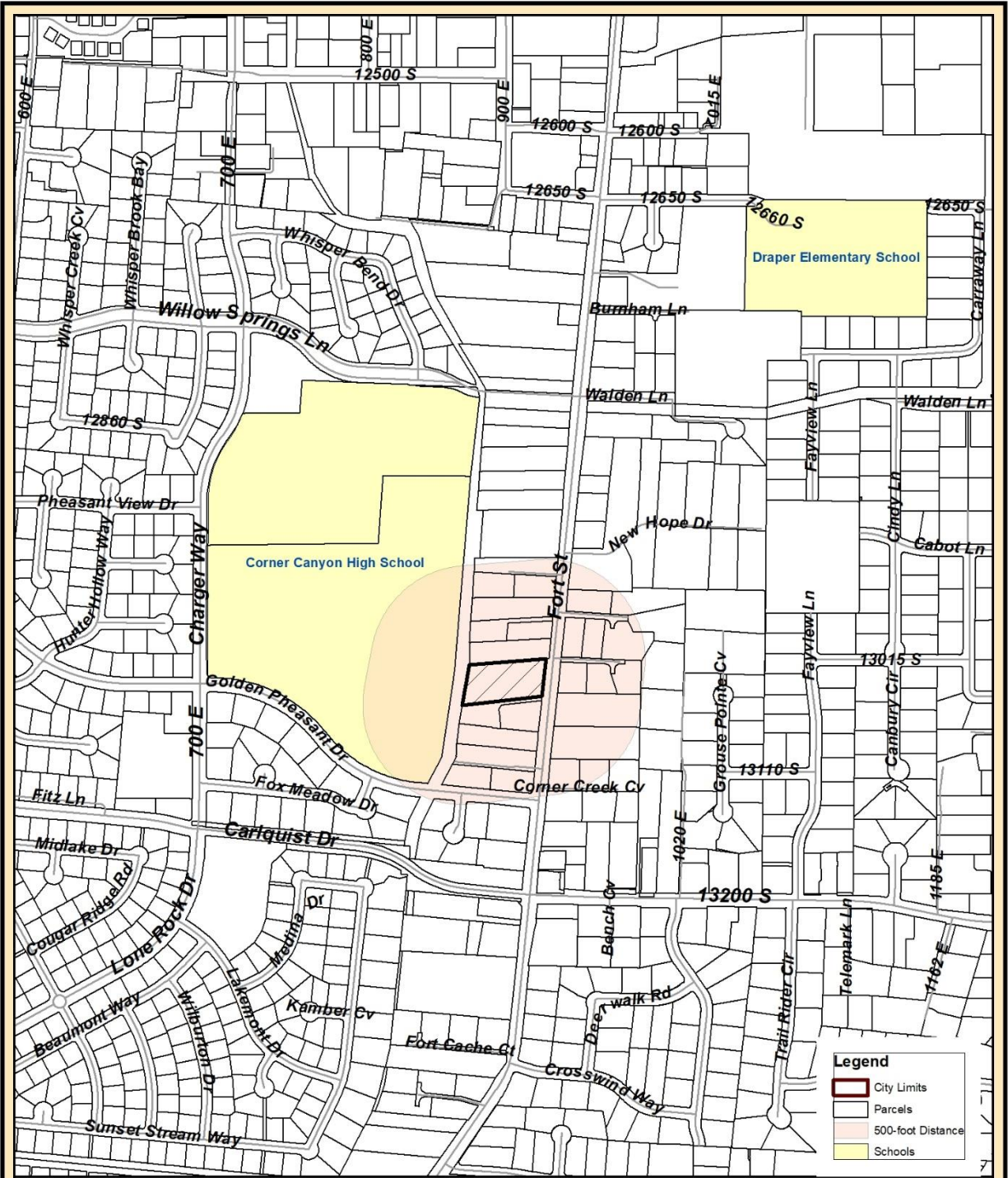
EXHIBIT D ZONING MAP



**Corner Canyon Health Center
Permitted Use Permit
Zoning Map**



EXHIBIT E SCHOOL DISTANCE MAP



**Corner Canyon Health Center
Permitted Use Permit
School Distance Area Map**



EXHIBIT F
SECURITY PLAN

Fort St. Security Plan

Corner Canyon takes the safety and security of its clients and neighbors seriously. Our desire is to be a good neighbor and be a part of the community while also providing our clients with the appropriate services they need in a safe and efficient manner. With this in mind, Corner Canyon has created a Security Plan to create structure for how this will be conducted.

Camera Surveillance

Corner Canyon has contracted with a local camera security company to plan and install a camera security system that will both monitor inside the facility as well as the exterior grounds. The camera system is on a closed circuit and only accessible within the staff office. Any access within the camera system is password protected.

24/7 Onsite Staffing

Corner Canyon will maintain 24/7 staffing. We will have three shifts per day; Day, Swing, and Grave. Grave shifts are awake shifts. There will be no live-in staff. One of staff's responsibilities while on shift is to conduct 30-minute rounds and document where clients are physically located. This will also be conducted during the grave shift. 15-minute rounds can be implemented on clients that might be of a higher risk or where clinical circumstances dictate this need.

Emergency Services

If a client reports homicidal or suicidal ideations to staff, the client will be placed on immediate line of sight and a member of the clinical staff will be contacted for further assessment. Should a client be deemed a threat to themselves or others, staff will call 911 and request EMS services to aid in the transport of the client to the nearest emergency department for further evaluation and stabilization. Should staff feel the client is not able to wait for a member of the clinical team to assess then staff will immediately call 911 and facilitate the clients needs and then report to the appropriate clinical and administrative staff.

Urine Analysis Testing

It is the expectation of all clients to remain abstinent from illicit drugs and alcohol while in any program of Corner Canyon. All clients will be subject to random urine analysis testing. If a client appears under the influence of any substance a urine analysis will be conducted. Corner Canyon Health Centers is a CLIA Waived facility and only utilizes CLIA waived point of care testing (POCT) cups. All samples are sent to a lab for confirmation. Clients are given on a 2-strike policy. Should a client fail urine analysis testing twice, they will be removed from the facility on the second positive test. Should a client appear under the influence of any substance and attempt to drive any vehicle, 911 will be called immediately.

EXHIBIT G
HEALTH AND SAFETY STATEMENT



CORNER
CANYON
health centers

Date: 4/2/21

To Whom It May Concern:

I, Cheryl Kehl, owner of the property of 13020 South Fort St, Draper, UT 84020, do hereby swear that no person will reside or remain in the facility who (1) constitutes a direct threat to health or safety of other individuals or (2) will result in substantial physical damage to the property of others.

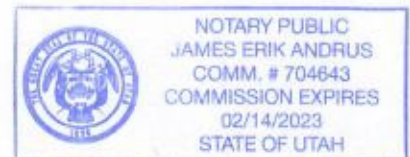
Cheryl Kehl
Owner, CEO
Corner Canyon Health Centers

Subscribed and sworn to me this 5th day of April 2021

(Notary)

Residing in Salt Lake County, Utah

My Commission Expires: 02/14/2023



1450 East Pioneer Road
Draper, Ut 84020
Phone: (801)994-1849 Fax: (801)384-0820
www.cornercanyonhc.com

EXHIBIT H
NON-CUSTODIAL CARE STATEMENT



I Robert Lund as owner/operator of my business Corner Canyon Recovery located at 13020 S. Fort Street declare to the building Department of Draper City, that the definition of Custodial Care as defined in section 202 in chapter 2 of the 2018 IBC (International Building Code) as amended and adopted by the State of Utah, and of Draper City does not describe the nature of my business, therefore understanding the definition of Custodial Care as it relates to my business and occupancy classification, request that the Building Official of Draper City designate occupancy classification for my business as an R-3, and not an R-4 use.

Dated this 24 day of May, 2021.

[Signature]
Signature

STATE OF UTAH)

: ss.

County of Salt Lake)

On the 24 day of May, 2021, personally appeared before me Robert Lund, signer(s) of the within instrument, who duly acknowledged to me that (t)he(y) executed the same.

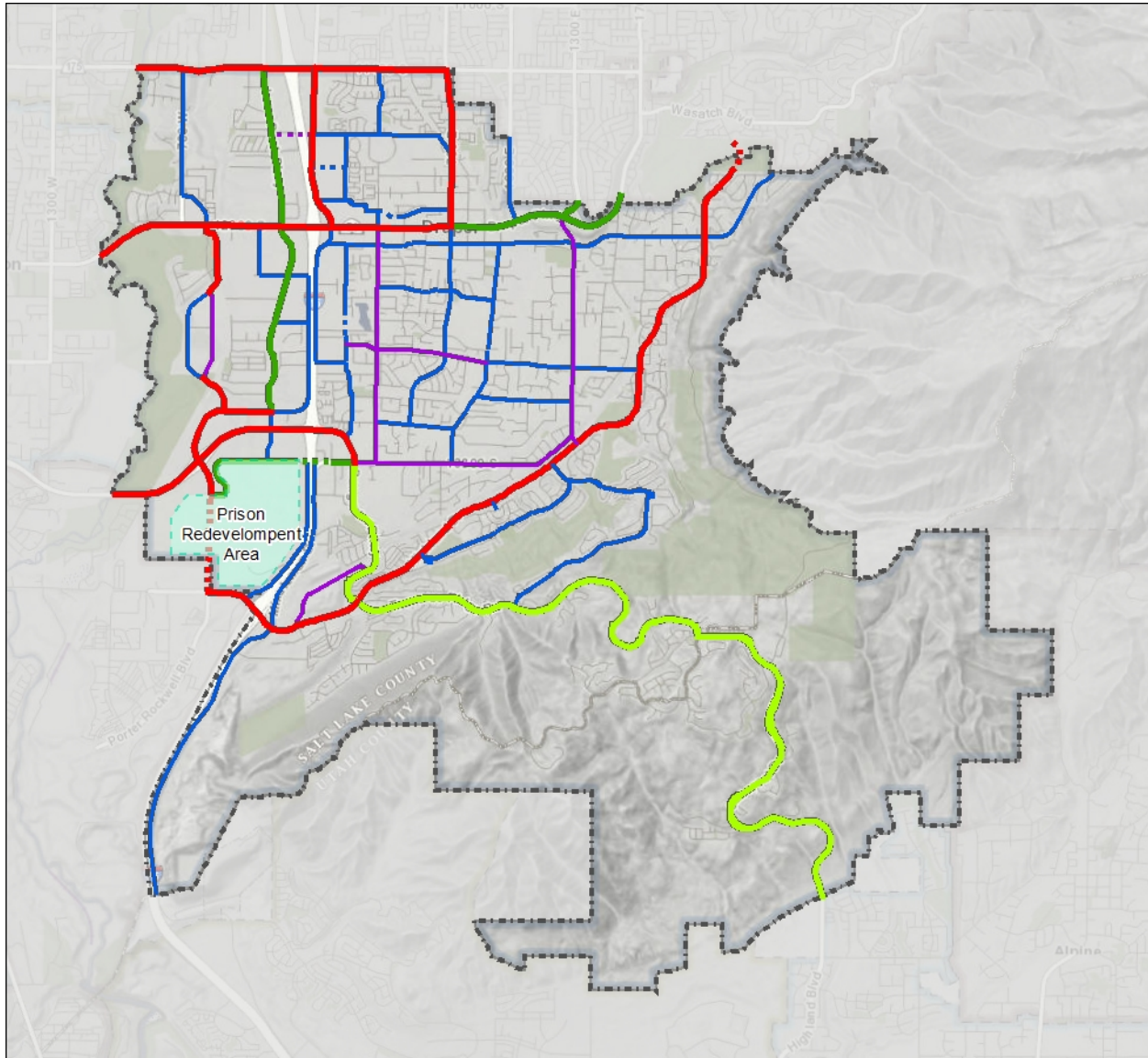


[Signature]
Notary Public

Approved by Draper City:

[Signature] 5/24/21
By: Date

EXHIBIT I
MASTER TRANSPORTATION PLAN FIGURE 4-15



Functional Class

- | | | |
|----------------------------|-----------------------------------|------------------------|
| Arterial | Future Minor Arterial (five lane) | Major Collector |
| Future Arterial | Minor Arterial (four lane) | Minor Collector |
| Minor Arterial (five lane) | Future Minor Arterial (four lane) | Future Minor Collector |

Figure 4-15. Full Functional Classification System

4.2 Access Management

Access management is a concept which has emerged over the past several decades to improve roadway system efficiency. Access management can be defined as the practice of providing restricted access to land developments to preserve traffic flow on surrounding streets, and simultaneously maintain safety, capacity, and speed. Access management can involve the control of a location, design, operations of driveways, median openings, and street connections to a roadway. Similar to the concept of functional