



DRAPER CITY HALL

Community Development | 1020 E. Pioneer Rd. Draper, UT 84020

January 28, 2026

***Draper City Planning Division
Administrative Interpretation***

RE: Station Point Use Interpretation

This letter evaluates whether a proposed business, Station Point Surf Park, is classified as a Recreation and Entertainment, Outdoor use under Draper City Municipal Code (DCMC). The business is looking to locate at 13708 South 600 West, parcel number 33-01-152-004. This undeveloped property is 12.71 acres in size and part of the larger Veranda West Master Area Plan. The Veranda West Master Area Plan includes townhomes, stacked flats, office, and retail uses. The property is located in the TSD (Transit Station District) zone and in the TSD-3 sub-zone. The Recreation and Entertainment, Outdoor use is listed as a conditional use in the TSD-3 sub-zone.

The DCMC defines the use classification in Section 9-3-040:

9-3-040: DEFINITIONS:

RECREATION AND ENTERTAINMENT, OUTDOOR: An establishment offering recreation, entertainment or games of skill to the general public or members wherein any portion of the activity takes place in the open. Typical uses include archery ranges, batting cages, golf driving ranges, drive-in theaters, miniature golf courses, tennis courts, and amusement rides.

The applicant has stated the surf park provides structured recreational activity, operated by a commercial entity, with controlled access, supervision, and defined hours of operation. The surf-generated technology does not produce continuous or industrial-level noise and operation times are electronically controlled. Background noise levels are comparable to swimming pools, sports complexes, and outdoor recreation facilities.

Staff reviewed the concept site plan, along with comparable surf parks around the nation to understand how the business runs. The concept plan includes the surf area and beach, a club house, 12 retail spaces, splash pad, and lounge pools. Comparable surf parks contain similar amenities, like restaurants, skate parks, group or private lessons, and wetsuit and board rentals. The sites reviewed allowed the general public to reserve time, and sold memberships that granted a certain number of reservation times.

The Zoning Administrator's task under DCMC 9-8-050(B) is to determine the use that the proposed business most closely aligns with.

9-8-050: CLARIFICATION OF ZONING:

B. Ambiguous Use Classification: If ambiguity arises concerning the appropriate classification of a particular use within the meaning and intent of this title, the following process applies:

1. Application: An applicant may submit a classification request to the Zoning Administrator to determine if a proposed business use aligns with an existing permitted or conditional use in this title. The application shall include information specified by the Zoning Administrator, such as use description, operational details, and site plans.
2. Zoning Administrator Review: The Zoning Administrator shall determine if the proposed use is substantially similar to an existing permitted or conditional use based on the following criteria:
 - a. Type of goods and services provided;
 - b. Number of customers and employees;
 - c. Amount and type of on-site storage; and
 - d. Noise, odor, or vibration generated.

When reviewing the criteria under DCMC Section 9-8-050(B)(2), the Zoning Administrator can remove Subsection c from the analysis as there is no on-site storage.

Subsection a addresses type of services and goods provided. Based on the previous analysis of the business, it does provide typical uses that can be found in the Recreation and Entertainment, Outdoor use category. Existing uses under this category that are currently operating in the City are Cowabunga Bay Water Park and Boondocks. Cowabunga Bay Water Park has water slides, a lazy river, beach, and cabanas. While Boondocks provides both indoor and outdoor activities, the outdoor activities include ropes course, miniature golf, go-karts, and bumper boats.

Subsection b reviews number of customers and employees. Based on the data provided by the applicant, the business is open to the general public and sells memberships. Reservations are required in both instances in order to surf, with the rest of the site amenities available without a reservation. Given the size of the complex, it would be expected that there will be a substantial amount of people at the business during peak hours.

Subsection d reviews noise, odor, or vibration what would be generated from the proposed business or either use classification. The applicant did not provide any information on noise levels other than to state that the facility does not produce continuous or industrial-level noise. Any proposed business is required to comply with the DCMC Chapter 7-6 Noise Control standards.

The Zoning Administrator finds that the proposed Station Point Surf Park business is substantially similar to Recreation and Entertainment, Outdoor use as the business model closely aligns with other typical Recreation and Entertainment, Outdoor uses.

There are a couple options available to you if you wish to pursue this matter further. You may seek a text amendment in order to change the code, or you may appeal this determination. An appeal is subject to DCMC Section 9-5-180 and shall be made within 10 days of the decision which is appealed. Applications for all options can be found on the city's website.

If you have further questions, please contact me at jennifer.jastremsky@draperutah.gov or at 801-576-6328.

Respectfully,

A handwritten signature in black ink, appearing to read 'Jennifer Jastremsky', written over a horizontal line.

Jennifer Jastremsky, AICP
Community Development Director / Zoning Administrator
Community Development Department