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July 26, 2018

Don Davis
River Heights Zoning Administrator
River Heights City Office
520 South 500 East
River Heights, UT 84321

**Re: Memorandum Supporting Zoning Clearance Permit Application Filed by
1000 East Homeowners**

Dear Mr. Davis:

This Memorandum is filed by Andrew Bentley, Tyson Glover, William Moore, Braden Merrill, and Nick Larson (collectively, the “1000 East Homeowners” or “Homeowners”), by and through their attorneys, in support of their *Zoning Clearance Permit Application* (the “*Application*”), dated July 26, 2018. The Homeowners’ Application seeks permission from River Heights, and eventually from the Cache County Building Department, to build standard and customary six-foot perimeter fences (above sidewalk grade) in their backyards. They wish to protect their families and homes, like every other homeowner in the community. The Application also seeks a variance from all purported landscaping obligations set forth in the final *Saddlerock Subdivision Phase 3 Plat* (the “Plat”), including the duty to form a landscaping committee and install and pay for uniform landscaping (the Homeowners will of course abide by landscaping ordinances that are generally applicable to homeowners in the City). The *Application* asks only that the Homeowners be allowed to do what all River Heights homeowners can do in all other residential zones. Indeed, most homeowners within the City need not even seek permission from either the City or the County to build a similar fence or landscape their yards because, except for the homes not adjacent to an intersection, the proposed fences meet all the City’s zoning ordinances and land use regulations. The only reason these Homeowners seek a zoning clearance is because of the unlawful land use regulations the City purported to impose on the 1000 East Homeowners via the final Plat—restrictions *not* included in Phases 1 and 2 of the same subdivision. Furthermore, the neighborhood overwhelmingly supports the *Application* and asks that it be granted. See *Petition Supporting Families Along 1000 East* (the “*Petition*”), attached.

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As for the two 1000 East Homeowners whose lots are adjacent to an intersection (the Glovers and Moores), they should similarly be permitted to build six-foot backyard fences because the proposal complies with all zoning setbacks and requirements. *See* enclosed *Saddlerock Phase 3 Fencing Exhibit* (“*Fencing Exhibit*”). Furthermore, it ensures that drivers will maintain a safe and clear line-of-sight when passing through the intersection. *Id.* While a six-foot fence could presumably obstruct views at some intersections, the proposed placement of these fences will allow all vehicles passing through 1000 East and 400 South to maintain an eminently safe view of oncoming vehicular and foot traffic.

This Memorandum starts by providing a brief history of the development of this subdivision, the owners’ purchases of their lots, and the purported conditions found only in the Plat’s “Notes and Restrictions.” Then the Memorandum discusses, **first**, how all the River Heights ordinances require approval of the *Application*; **second**, the procedural shortcuts and failures taken in approving the Plat, which infringed on the Homeowners’ due process rights; and **third**, how the land use regulations placed on the Plat abuse the 1000 East Homeowners’ families’ substantive rights to protect their yard, home, children, and loved-ones to the same extent as any other River Heights homeowner.

I. Background and History.

Most or all of the 1000 East Homeowners paid deposits and committed to their lots before the City ever attempted to include the disputed conditions in the final Plat. Unbeknownst to the Homeowners, the River Heights Planning Commission and Dan Hogan, the developer of *Saddlerock Subdivision Phase 3*, met and decided to cram down unique restrictions and unfunded mandates on the Homeowners by adding them to the final Plat. The Homeowners had no reason to know such conditions were even being discussed and did not become aware of the purported restrictions in the Plat until long after the City had approved them. Further, these restrictions and mandates were placed on *only* the 1000 East Homeowners; other River Heights homeowners (including those in Phases 1 and 2 of this same subdivision) are subject only to generally applicable ordinances and regulations, which expressly *allow* the actions requested by our clients herein.

Specifically, the “Notes and Restrictions” portion of the Plat reads, in part: “Lots 58–62 and 72 have a fence height limit on 1000 East Street of 4’ above the sidewalk grade.” The Plat also states:

Owners of Lots 58–62 and 72 are required to maintain the park strip, sidewalk, and buffer zone of 1000 East in the same way as the frontage of the lot, in accordance with River Heights City code. These lot owners will be part of a design committee, in cooperation with River Heights City staff and City Council, to design a uniform corridor appearance for fencing, vegetation and ground cover along 1000 East Street, recognizing the limitations presented by the buried storm drain.

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These limitations were not explicitly listed in the deeds sold to the Homeowners, and the only supposed means of notice was through the filing of the Plat with the Cache County Recorder. The 1000 East Homeowners first learned they were being treated differently than all other River Heights homeowners only after they began planning to build their backyard fences. Importantly, when the City discussed these limitations in May 2017, several commissioners and engineers expressed concern about the lack of safety, security, and privacy provided by a four-foot fence, and stated that the owners should be made aware if the City intended to impose such conditions. In other words, the precise concerns the Homeowners now have.

The proposed backyard fences are intended to serve an eminently reasonable purpose: providing safety, security, and privacy to their homes and families. These fences will not obstruct the line-of-sight of the vehicular traffic along 1000 East and 400 South. *See Fencing Exhibit*. Any resident of River Heights knows that 1000 East is a busier-than-average thoroughfare. In fact, the City's *Transportation Master Plan Map* identifies 1000 East as one of the seven Collection Streets within the City. Not only that, the *Trail and Park Master Plan Map* also identifies 1000 East as a proposed trail for pedestrian use. This means that along one of the busiest streets, which is slated to continue being a transportation corridor for both vehicular and foot traffic, Mr. Hogan and the City foisted fence-height restrictions on the 1000 East Homeowners that would leave them exposed to public view and vulnerable to potential trespassers and burglars. In contrast, all River Heights homeowners on quieter, less-traveled streets are allowed to build six-foot-high perimeter fences without even applying for a permit. Also, no other River Heights homeowners are required to form a landscaping committee, negotiate uniform landscaping plans with the City, or pay for such landscaping, despite the lack of any HOA, condominium association, or homeowners' fees for this development. The 1000 East Homeowners are being treated differently and arbitrarily as compared to other homeowners in the City. Therefore, they ask that their *Application*—which comports fully with all ordinances, statutes, and regulations with the force of law—be approved.

II. The Zoning Administrator Should Approve the *Application*.

A. Applications must be approved when in compliance with River Heights ordinances.

The Utah Code states that a person “desiring a waiver or modification of the requirements of a land use ordinance as applied to a parcel . . . may apply . . . for a variance from the terms of the ordinance.” Utah Code § 10-9a-702(1). River Heights Code section 10-3-4(B) requires a person seeking a building permit to file a *Zoning Clearance Permit* (“ZCP”), which is the equivalent of the present *Application*. “The ZCP is documentation that the applicant’s plans are in compliance *with this title*.” River Heights Code § 10-3-4(B) (emphasis added). Notably, a ZCP application, need not document that the plans comply with the subdivision plat, only with Title 10.

B. The River Heights ordinances expressly allow six-foot perimeter fences in residential backyards and do not require landscaping committees or uniformity; and the Plat is not a land use regulation that could supersede the ordinances.

Title 10 of the City's Code provides generally applicable "Zone Regulations" that set forth objective limitations for different areas within the City. *Id.* § 10-12-2(A). Those limitations establish a six-foot maximum height for backyard perimeter fences, so long as the home is not on a corner lot. *Id.* Notably, the six-foot height allowance is the same for agricultural, planned-use developments ("PUDs") and *all the residential zones*, including the R-1-8, R-1-10, and R-1-12 zones. Indeed, one need look no further than the last page of the City's form ZCP Application, which shows that a backyard fence may be as high as six feet. <https://www.riverheights.org/wp-content/uploads/2017/12/Zoning-Clearance-Permit-1.pdf> (last visited July 18, 2018). Even Cache County Building Department's website states that "Fences not exceeding 7 ft tall. Permit not required." <https://www.cachecounty.org/building> (last visited July 18, 2018).

Similarly, Chapter 15 of Title 10 of the City's Code includes all of the City's landscaping ordinances—none of which require homeowners to form landscaping committees or landscape their yards in uniformity. Neither the Planning Commission nor the City Council had any authority to mandate these obligations onto any citizen including the 1000 East Homeowners.

As for the Moore and Glover residences, which are adjacent to the 1000 East-400 South intersection, these homeowners should likewise be allowed to build six-foot backyard fences because their plans ensure that the line-of-sight is properly maintained. The only possible rational explanation for requiring a four-foot fence at the intersection is to ensure the line-of-sight for drivers. That safety concern is fully allayed by setting the fences back, away from the intersection, to maximize all travelers' view of the streets. *See Fencing Exhibit*. Other nearby towns allow corner lots to build six-foot fences in this exact way. *See, e.g.,* Providence City Code §§ 5-4-3, 10-9-2, <http://www.providencacity.com/city-code.htm>; Millville City Code §§ 17.40.040(K), .050(C)–(D), <https://millvillecity.org/city-government/citycode>. Providence and Millville have safe and attractive neighborhoods and they allow six feet fences for the corner-adjacent lots. But not only Providence and Millville allow such fences; indeed, even River Heights has allowed them in multiple places in the community. The *Fencing Exhibit* shows three examples of corner lots within the City that have six-foot backyard fences. And the Moores' and Glovers' fences would comply with River Heights most specific ordinance addressing the "clear view of intersecting streets." *See* River Heights Code § 10-13-15. It would be capricious not to allow the Moores and Glovers to build a similar fence that provides the public with adequate views of the street and other foot and vehicular traffic, as the City has done for other homeowners with corner lots.

The *Application* should be granted because the fences comply with the purposes of the River Heights ordinances, and the *Application* cannot be denied based on the restrictions placed

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in the Plat. There is nothing within the state statute, the City Code, or the ZCP Application that would allow the Zoning Administrator to deny an application based on a note or restrictions placed in a subdivision plat. The only mention of a plat within the ZCP Application seeks a confirmation that the owner or builder has “reviewed and understand[s] all notations on the plat for the piece of property” It does not require the owner to comply with any of the notations, only to understand them. This is because the ZCP Application recognizes the obvious fact that subdivision plats are not instruments where substantive land use regulations are adopted. Instead, a plat is a surveying map intended to show property lines. Utah Code § 10-9a-103(42) (“Plat’ means a map or other graphical representation of lands”).¹

Nothing within Utah’s statute concerning municipal subdivisions authorizes a municipality or developer to install substantive land use regulations or restrictions on a subdivision plat. Sections 10-9a-603 and 604 set forth only objective, physical requirements of a plat. Even when the statute requires entities, such as the health department or fire authority, to review a plat, those entities are allowed either to recommend an up-or-down approval, not amendments in the form of substantive subjective restrictions. *See id.* § 10-9a-603(d)–(c). And while subsection 604(c) requires that “all approvals . . . are entered in writing on the plat by the designated officers,” it does not grant the municipality the authority to write land use regulations into the plat. The plain and ordinary reading of this subsection is only that all approvals must be made in writing so that an approval cannot be implied or made orally. This in-writing requirement comports with traditional property law. Similarly, the Providence ordinance recognizes that the only other possible restrictions on fencing might come from deeds or homeowners’ associations. Providence City Code § 5-4-3(B). Providence recognizes no possibility that a subdivision plat could house any fence restrictions.

The Utah legislature recently amended the definition of “land use regulation” in a way that further proves a plat is no place for instituting zoning or land use regulations. 2018 Utah Laws Ch. 339 (H.B. 377) (amending Utah Code section 10-9a-103(26) to read: “‘Land use regulation’: (a) means a legislative decision enacted by ordinance, law, code, map, resolution, specification, fee, or rule that governs the use or development of land; [and] (b) includes the

¹ Other State statutes and River Heights ordinances support this conclusion. For example, the State statute concerning subdivision plats mandates that municipalities “shall establish objective inspection standards for acceptance of a required landscaping . . . improvement.” Utah Code § 10-9a-604(a). River Heights promulgated these objective standards in Chapter 6 of Title 11 of River Heights Code. These objective standards include the length and width of City blocks, sidewalks, and water, sewer, and storm-drain systems. River Heights Code §§ 11-6-1 to -6. There are standards for irrigation ditches, street trees, street lighting, street signs, and monuments; however, there are no objective standards for fences. *Id.* § 11-6-7. And a plain and ordinary reading of the statute and ordinance connotes that subjective standards or requirements would be unlawful.

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adoption or amendment of a zoning map or the text of the zoning code . . .”). Notably, a plat is not included in the statutory definition and is nothing like the other items mentioned. Further, the use of “map” obviously refers to only official maps that have special legal effect, like a “Zoning map,” which “means a map, adopted as part of a land use ordinance, that depicts land use zones, overlays, or districts.” Utah Code § 10-9a-103(63); *see id.* §§ 10-9a-406, -503. In sum, no Utah law allows the City to single out individual landowners for zoning and land use regulations by imposing those regulations via a plat.

Because the Plat is not a lawful land use regulation, the Zoning Administrator must apply only the ordinances and the zoning or general plans. Utah’s statute states that a “land use authority [i.e., the Zoning Administrator] *shall* apply the plain language of the *land use regulations*” and “[i]f a land use regulation does not plainly restrict a land use application, the land use authority *shall* interpret and *apply the land use regulation to favor the land use application.*” Utah Code § 10-9a-306(1)-(2) (emphases added). Further, the River Heights City Council must treat all homeowners the same within the zoning district. *Id.* § 10-9a-505 (“The legislative body shall ensure that the regulations are uniform for each class or kind of buildings throughout each zoning district, but the regulations in one zone may differ from those in other zones.”). This statutory mandate for the City Council to treat all the homeowners equally under the law was ignored and circumvented by placing the fence height restrictions and landscaping obligations in the Plat. The Zoning Administrator should correct the City’s prior errors and approve this *Application*.

III. Attempting to place land use regulations in the Plat infringed the 1000 East Homeowners’ due process rights.

Because subdivision plats cannot be used to create land use regulations, any land use regulation or restriction written on the plat that contradicts ordinances or other zoning regulations does not constitute notice through any constructive notice theory. This is because no reasonable person would look to a plat to determine what the land use regulations are. A reasonable person might review a deed or other property instrument to see if there is some special covenant, and would certainly review the City ordinances and zoning plans or maps. The fence-height and other restrictions found in the Plat, however, contradict the deeds filed in the County Recorder’s Office and, more importantly, are contrary to all City ordinances, plans, and maps. There was no restrictive covenant placed in the deeds as Craig L. Rasmussen P.E., the City Engineer, implied would be necessary in his May 17, 2017 letter to the Planning Commission. Even Councilmember Dixie Wilson, at the City Council’s May 23, 2017 meeting, asked if the proposed obligations could be stated in the 1000 East Homeowners’ deed so that they would actually be made aware of it. At the City Council meeting, Engineer Rasmussen also suggested sending a letter to the property owners announcing the supposed restrictions; but even that was not done. Simply publishing notice of a public meeting is legally insufficient when the meeting is to address not generally applicable regulations and ordinances, but instead to single out and impose restrictions on *one particular group of homeowners*. *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 313 (1950) (holding that notice by publication only is

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inadequate for providing due process to known and locatable beneficiaries); *see also Salt Lake City Corp. v. Jordan River Restoration Network*, 2012 UT 84, ¶¶ 48–72, 299 P.3d 990; *Jackson Constr. Co. v. Marrs*, 2004 UT 89, 100 P.3d 1211 (2004).

Accordingly, there cannot be any constructive notice placed on 1000 East Homeowners. And without that constructive notice, due process requires that they receive actual notice and an opportunity to be heard before the land use regulation takes effect. For this reason alone, the City's actions are unlawful and unenforceable.

IV. It is unsafe and unreasonable to require the 1000 East Homeowners to protect their windows and backyards with only four-foot fences that would be merely a playful hurdle for a potential intruder.

Given the grade of the sidewalk compared to the homeowners' lots, the restriction the City is attempting to impose will allow passersby an open view of the Homeowners' backyards. Fences only four feet above the sidewalk grade would also be easily breached by intruders who could simply lean across or jump from the sidewalk over the top of the fences. In other words, the four-foot "above sidewalk grade" restriction is meaningless with respect to addressing the homeowners' legitimate concerns over safety and privacy (concerns the Commission members themselves have expressed). The 1000 East Homeowners are legitimately worried about a restriction that would allow total strangers to freely peer at, case their homes, and enter their backyards. They are entitled to privacy, safety, and security in their homes, as are all other River Heights families. Again, 1000 East is a busy street, so these families have a heightened concern for their safety. The 1000 East Homeowners purchased their lots with the expectation of building as safe a home as the others in the community. Indeed, Commissioner Cindy Schaub, in the May 17, 2017 Planning Commission meeting, agreed that young families would want a fence to protect their families. The City Council even recognized that the Planning Commission thought it a good idea to allow the homeowners to build a four-foot retaining wall with a four-foot fence on top of that. That would be a total of *eight feet*; that is, two feet lower than what the homeowners request in their *Application*.

Likewise, it is without precedent or authority for the City to mandate that the 1000 East Homeowners form a committee to establish a uniform landscaping plan for their street. Obviously, the City, for some unknown and unreasonable basis, is treating the 1000 East Homeowners differently from other City residences, by attempting to impose via the Plat conditions that are akin to a homeowners' or condominium association. Further, the City's attempt to create such obligations via the Plat is not only unlawful and contrary to the City Code, it is also contrary to the City's apparent interest in having attractive public streets.

Below are several photographs of properties in other cities in Cache Valley. The first shows a city-maintained public street, with the homeowners' fences located at the perimeter of their properties. The others show various properties where the cities have attempted to require the homeowners to landscape and maintain the public corridor. As far as we know, the

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homeowners in the latter photos did not challenge the obligations, but simply allowed the public corridor to exist in its natural state. As you can see, the public space in the latter photos is far less attractive. This is the likely outcome of the City's unlawful actions here. First, the Homeowners will pursue a legal challenge to the purported obligations the City placed in the Plat. And if they are required to participate in a committee and install uniform landscaping at



their expense, they will simply install the most cost-effective, low maintenance landscaping that complies with City ordinances, and the public space will continue in a mostly natural state. The City's apparent interest in the appearance of the public street at 1000 East would be far better served without the obligations the City included in the final Plat.

In addition, it would be grossly unfair for the City to foist the four-foot fence restriction onto the 1000 East Homeowners when their nearby neighbors who similarly live along 1000 East were allowed to build six-foot fences to protect and secure their families. To the right is an image of a neighbor of the 1000 East Homeowners who is enjoying the security and safety provided by an attractive six-foot fence. And there are many others in River Heights who enjoy the same, even on corner lots. *See Fencing Exhibit.*

In the end, there is no legitimate reason to single out the Homeowners as the City and Mr. Hogan have done. The River Heights community agrees with us and thinks the 1000 East Homeowners should be allowed to build the requested fences. *See Petition.* The fence-height

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restriction was never disclosed to the Homeowners until the City claimed it would enforce the restriction. Furthermore, even within the 1000 East neighborhood, the City has not enforced the supposed four-foot height restriction against other homeowners.

V. Conclusion

Ultimately, the Zoning Administrator has a simple task: decide whether the *Application* complies with the City ordinances without considering the restrictions that were unlawfully placed in the Plat. This is what the law obviously requires. The *Application* clearly conforms with the laws instituted by Utah and River Heights. Therefore, the *Application* must be approved. And this is the fair and equitable thing to do. It allows all the families and homeowners within River Heights to be treated the same way as the community continues to build safe, healthy, and attractive neighborhoods.

Sincerely,

MANNING CURTIS BRADSHAW
& BEDNAR PLLC

/s/ Jess M. Krannich

Jess M. Krannich

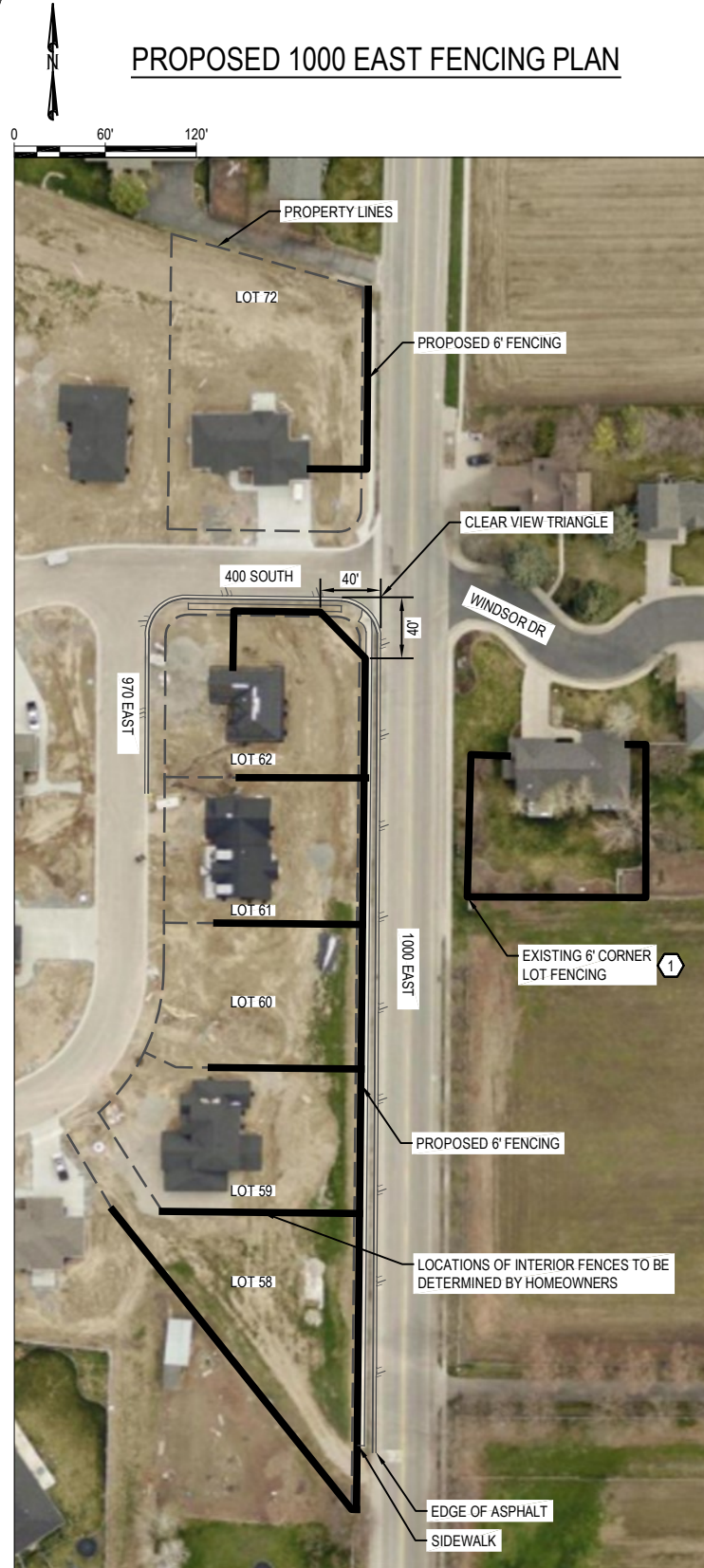
Attorneys for the 1000 East Homeowners

Encls. *Fencing Exhibit*
Petition Supporting Families Along 1000 East

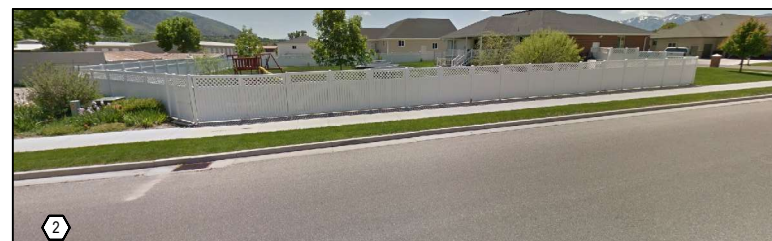
cc: Douglas J. Crapo
Jonathan E. Jenkins
Andrew Bentley
Tyson Glover
William Moore
Braden Merrill
Nick Larson

Fencing Exhibit

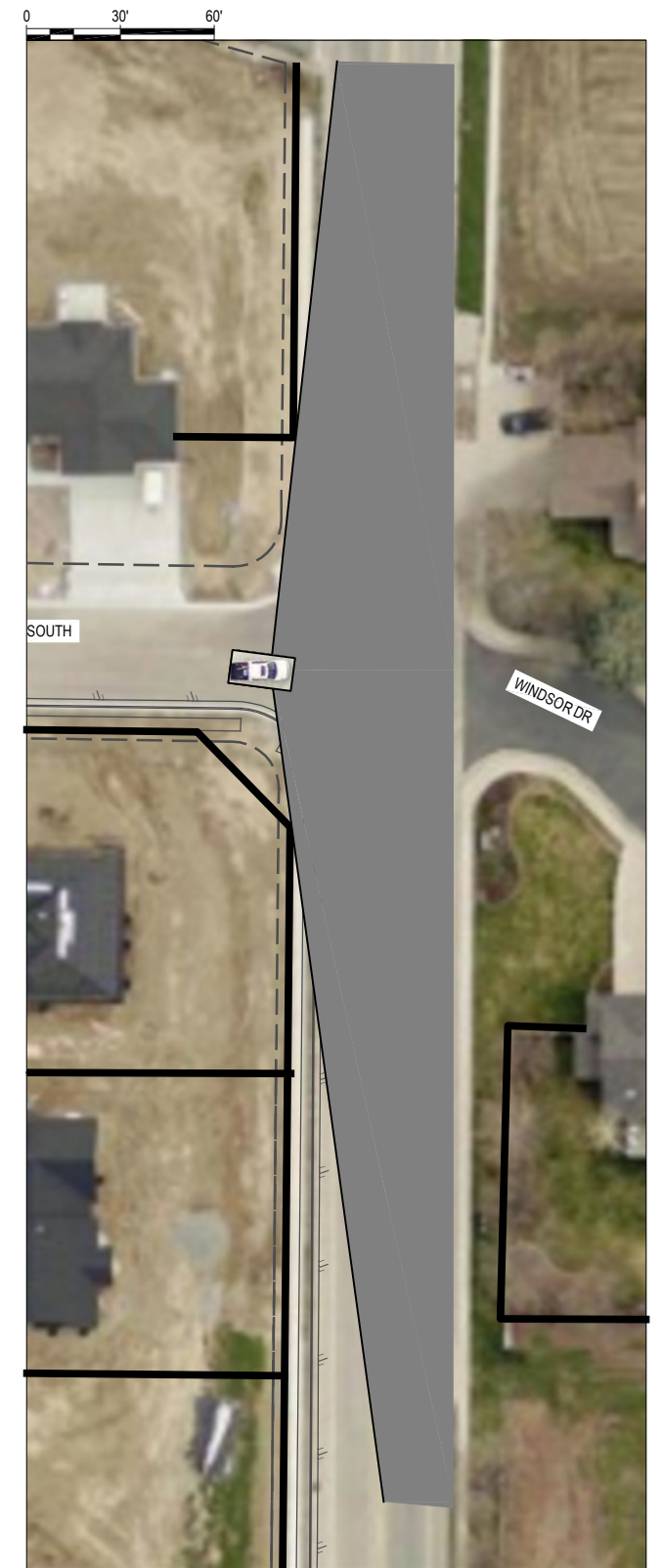
PROPOSED 1000 EAST FENCING PLAN



EXISTING 6' VINYL FENCES NEAR THE SADDLEROCK SUBDIVISION



CORNER LOT CLEAR VIEW OF INTERSECTION



NO.	DATE	DESCRIPTION

0 1 2
 IF THE ABOVE SCALE BAR DOES NOT MEASURE 1-INCH IN LENGTH, DO NOT USE THIS DRAWING FOR SCALING PURPOSES. DIMENSIONS AND MEASUREMENTS SPECIFIED IN THE DRAWING TAKE PRECEDENCE TO SCALED MEASUREMENTS.

SADDLEROCK SUBDIVISION PHASE 3 FENCING EXHIBIT

LOTS 58-62, & 78
 RIVER HEIGHTS, UT

PROJECT NUMBER	2018-01
SHEET	OF
1	1
SHEET NUMBER	001

Petition Supporting Families
Along 1000 East




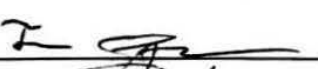

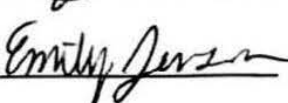
PETITION SUPPORTING FAMILIES ALONG 1000 EAST


We, the undersigned residents of the City of River Heights, provide our signatures to this Petition below in an effort to show our full support and commitment to families and homeowners who own properties along 1000 East. Specifically, we believe that the City should allow all 1000 East homeowners to enjoy their property rights without imposing unreasonable restrictions upon them concerning the height of their fences (e.g., 4 feet above sidewalk grade), how far their fences are located from the sidewalks (e.g., a 5 foot setback), or the landscaping to be installed between the homeowners' fences and the sidewalks (e.g., mandatory landscaping imposed by the City or by the City through mandatory participation in a "landscaping committee"). We understand that the City has attempted to impose, through conditions adopted in a final plat for the new subdivision on 1000 East, restrictions with respect to these issues that are not the same as are applicable to other residential areas within the City (including across the same street on 1000 East). We believe that these restrictions are improper, and that homeowners within the City should have the right to use and develop their properties as they see fit, so long as their use and development does not interfere with public safety or create a nuisance. And we believe that the restrictions the City is attempting to impose arbitrarily upon certain homeowners are improper and unfair because they sacrifice the homeowners' safety, privacy, and security, and unreasonably restrict the homeowners' property rights.

By signing our names below, we voice our opposition to the restrictions the City is attempting to impose via plat on the owners of certain homes located on 1000 East, and we voice our support for those homeowners being permitted to install fences within six to twelve inches of the existing sidewalk that are up to six feet high, to better protect and provide security and privacy for their family and loved ones. We also voice our opposition to conditions imposed by the City that would require City residents who are not part of a condominium association and do not pay condominium dues to participate in landscaping or other committees or agree upon uniform landscaping to be installed at the homeowners' expense.

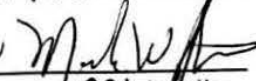
Name

Address

<u>Clayton F. Gurnell</u> 	<u>392 South 950 East River Heights UT 84321</u>
<u>Andrea Moore</u> 	<u>989 E 400 S River Heights, UT 84321</u>
<u>William Moore</u> 	<u>989 E 400 S River Heights, UT 84321</u>
<u>Tyson Glover</u> 	<u>402 S 970 E River Heights, UT 84321</u>
<u>SHANE WILDE</u> 	<u>435 S 970 E RIVER HEIGHTS UT 84321</u>
<u>Emily Jensen</u> 	<u>3955 950 E River Heights UT 84321</u>

Andrea Hansen 

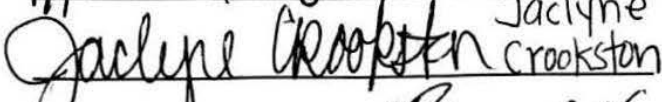
387 S 950 E, River Heights UT 84321

MARK JOHNSON 

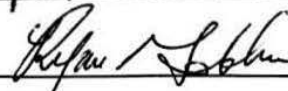
944 E 400 S

Michelle Kimball 

952 E. 480 S.

Jaclyne Crookston 


964 E 480 S. River Heights

RYAN GROMUNDSON 

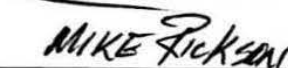
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970 E. 490 S. 435-512-2724