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Counsel for Vince Rogers

BEFORE THE HONEYVILLE CITY COUNCIL

IN THE MATTER OF THE REQUEST FOR DISCONNECTION OF REAL PROPERTY FROM THE MUNICIPAL LIMITS OF HONEYVILLE, UTAH	**PETITION AND REQUEST FOR DISCONNECTION UNDER UTAH CODE SECTION 10-2-501**

Pursuant to the Municipal Disconnection provisions of Utah Code § 10-2-501 et seq., the undersigned Petitioner hereby submits this Request for Disconnection to the City Council of Honeyville, Utah (the "City").

1. **Petitioner Information:** The Petitioner is the owner of title to the real property proposed for disconnection (the "Property") and represents the owners of more than 50% of the private real property within the Property, as required by Utah Code Ann. § 10-2-501(2)(b)(i), as he is the only owner requesting disconnection.

Name of Petitioner: Vince Rogers

Mailing Address: PO Box 2721 Park City, UT 84060 or through counsel identified below.

Property Tax ID/Parcel Numbers:

04-029-0007
04-029-0013
04-029-0014
04-029-0016
04-028-0010

2. **Designated Representatives:** Pursuant to Utah Code Ann. § 10-2-501(2)(b)(iv), the Petitioner designates the following persons with authority to act on the Petitioner's behalf in all proceedings:

Ruth Hackford-Peer,
Partner, HOOLE & KING LC,
4276 S. Highland Drive, Salt Lake City, UT 84124
(801) 834-5579
Ruthhp@hooleking.com

3. **Description of the Property:** The Property lies on the borders of Honeyville City and unincorporated Box Elder County. A detailed legal description of the Property is attached hereto as **Exhibit A** and incorporated by this reference. The Property is bordered on the West and South by unincorporated Box Elder County and the North and East by the City. A plat with the subject property outlined in red is also included as **Exhibit B**.

4. **Reasons for Proposed Disconnection:** The proposed disconnection is requested for the following reasons:

- **Agricultural:** The property is used for agricultural purposes, namely rural farming. The City's suburban-focused zoning codes and regulations conflict directly with standard, necessary agricultural operations.

- **Municipal Restrictions**: Such as restricting the number of dogs per property, harm active farming operations that require multiple working farm dogs for livestock protection

and property management. While the property owner could apply for a City Kennel Permit, it illustrates that the property owner has to pay extra fees to apply for special city permits just to have standard farm dogs, which is an unnecessary regulatory burden that county zoning would not require.

- **No Municipal Services:** The Property receives no municipal services/utilities from the City. The City does not provide water or sewer infrastructure to this agricultural parcel.

- **Property Borders County:** Disconnecting the property will not leave or create municipal islands or peninsulas of unincorporated territory. It will not strip the City of critical infrastructure, and will not impair the City's ability to function.

- **Taxes:** The property owner pays high municipal property taxes but receives zero corresponding municipal benefits, creating a clear economic inequity.

- **Practicality:** The City takes issue with temporary tools for agricultural management. Rather than accommodating standard agricultural practices on this property, City regulations penalize the necessary, self-funded infrastructure (such as the break/shelter area and portable sanitation) required to work the land without City utilities.

5. Upon receiving this request for disconnection, the City Council shall publish notice of the request per Utah Code § 10-2-501(3)(a-b).

HOOLE & KING LC

/s/ Ruth Hackford-Peer
Ruth Hackford-Peer

Counsel for Vince Rogers

File No. 157726

EXHIBIT "A"
LEGAL DESCRIPTION

PARCEL 1: 04-029-0007
All that part of the following described tract of land lying East of Interstate Highway I-15: Beginning at a point 891.0 feet South and 2213.1 feet West of the Northeast corner of Section 16, Township 10 North, Range 2 West, Salt Lake Base and Meridian; and running thence South 23°54' East 2754.00 feet; thence North 89°53' West 2863.8 feet; thence North 0°33' East 1600.4 feet; thence North 64°40' East 1494.5 feet; thence North 54°34' East 469.0 feet to the point of beginning.

PARCEL 2: 04-029-0013
All that part of the following described tracts of land lying West of the O.S.L.R.R. right of way and East of New Interstate Highway 15-8: Beginning at a point North 3°29' West 1685.8 feet from the Southeast corner of Section 16, Township 10 North, Range 2 West, Salt Lake Base and Meridian; thence North 23°41' West 249.2 feet; thence West 3760.6 feet; thence South 231 feet; thence East 3857 feet to beginning.

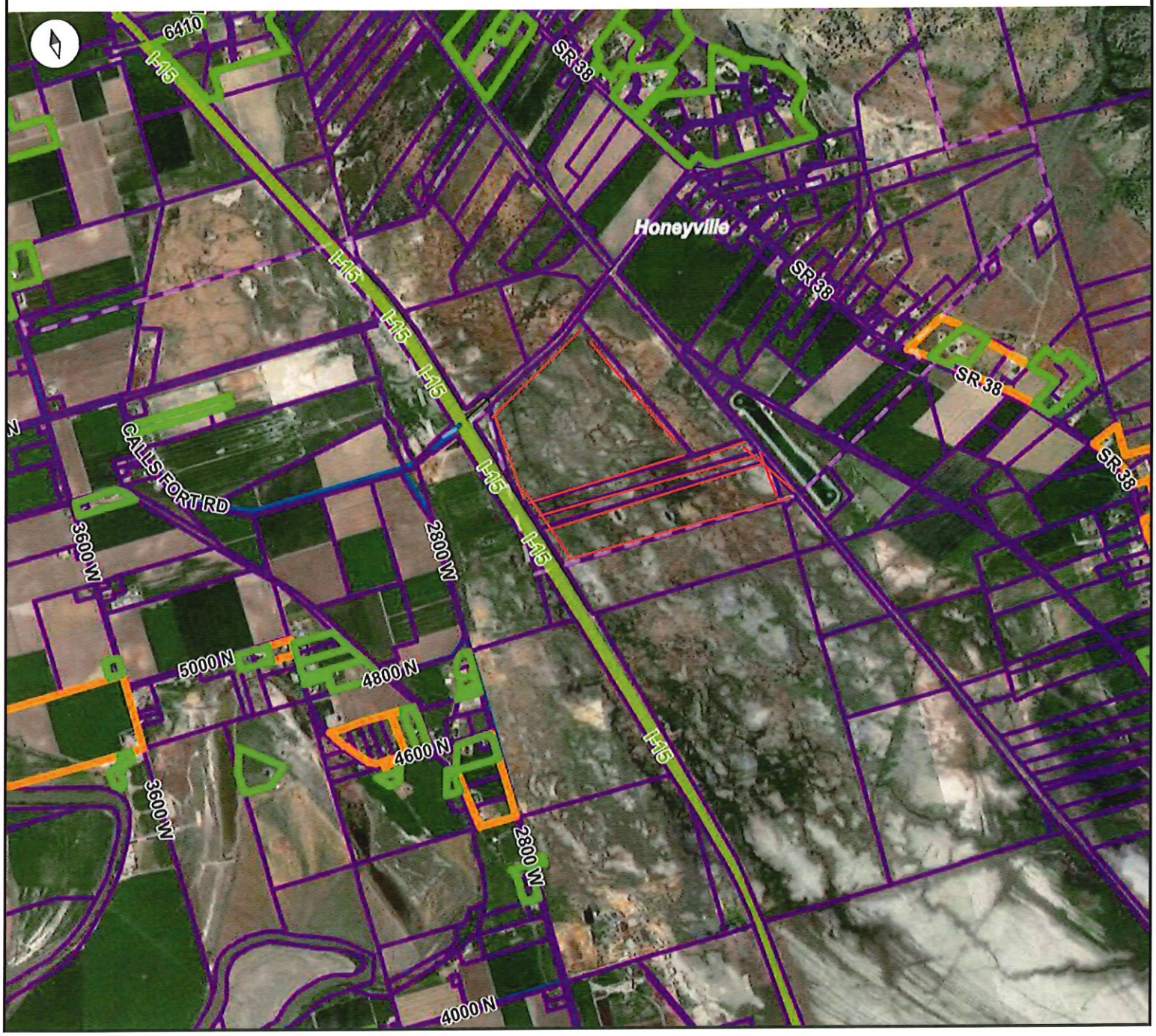
PARCEL 3: 04-029-0014
All of the following East of I-15: Commencing at a point North 0°56' West 1498 feet from the Southeast corner of Section 16, Township 10 North, Range 2 West, Salt Lake Base and Meridian; thence North 23°41' West 200.6 feet along right of way of O.S.L.R.R. right of way; thence West 3857 feet; thence South 183.8 feet; thence East 3935.5 feet to the point of beginning.

PARCEL 4: 04-029-0016
All that part of the following tract lying East of I-15: Commencing 844.6 feet North from the Southeast corner of Section 16, Township 10 North, Range 2 West, Salt Lake Base and Meridian; thence North 648.4 feet; thence West 3960 feet; thence South 648.4 feet; thence East 3960 feet to the point of beginning.

PARCEL 5: 04-028-0010
All that part of the following land lying West of O.S.L.R.R. right of way: Commencing 8 rods West of the Northwest corner of Southeast Quarter of Southwest Quarter of Section 15, Township 10 North, Range 2 West, Salt Lake Base and Meridian; thence South 62 1/2° West 81 rods; thence North 38 rods; thence East 72 rods to the point of beginning.

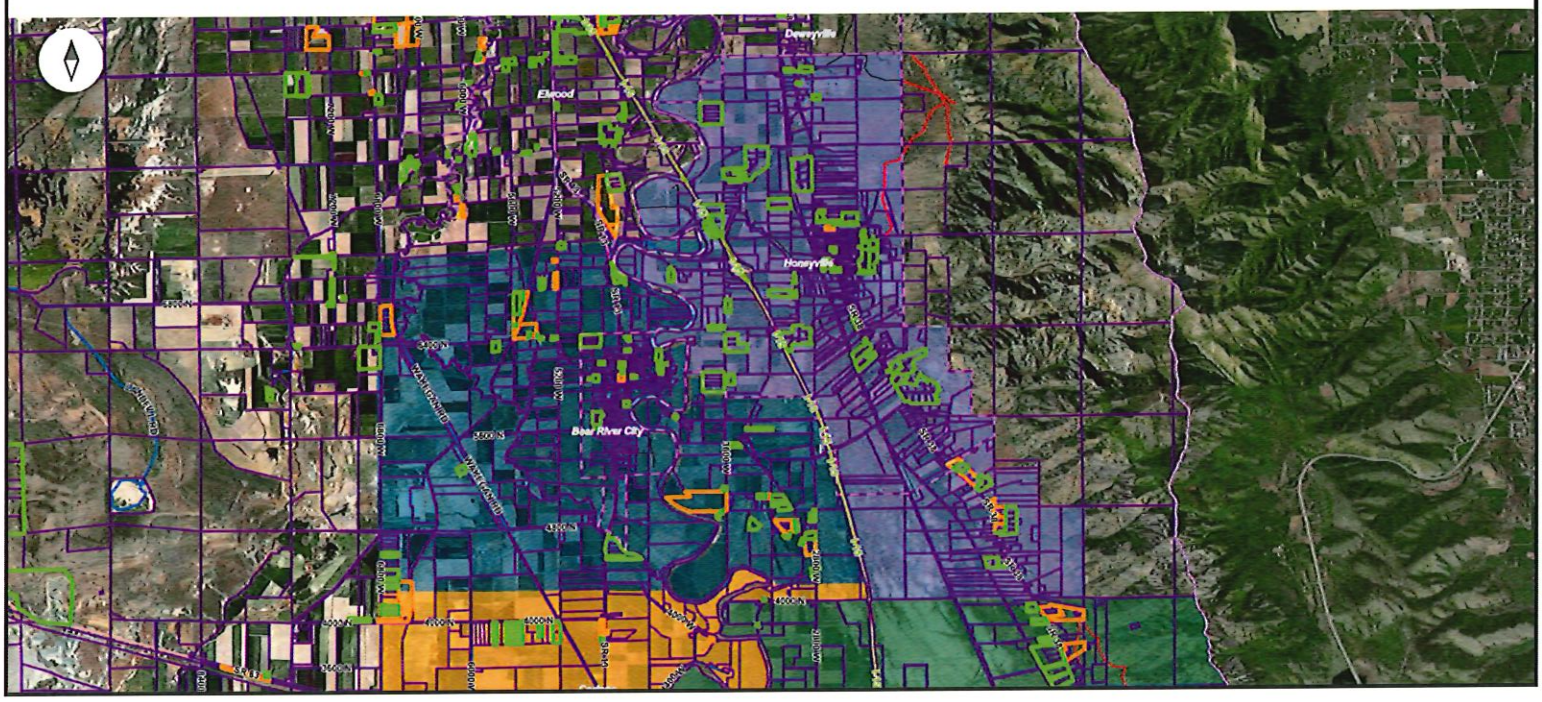
Old Box Elder County Web Map

Subject Property in Red



Vantor | Box Elder County GIS Office & the many local Engineering and Surveying firms of Northern Utah.

Annexation Policy Plan - BE County Map



Earthstar Geographics | Box Elder County GIS Office & the many local Engineering and Surveying firms of Northern Utah.

Boundaries
Box Elder County Polygon

Cities

Cadastral Layers
Subdivisions

Minor Subdivisions

Tax Parcels

Road Layers
Roads

Freeway — Ramps — Highway — County B — County D — City - - - - Private

Annexation Policy Plan

Bear River | Deweyville | Brigham City | Corinne | Garland | Honeyville | Mantua | Perry | Tremonton | Willard

Rogers Property - Surrounding County Zoning

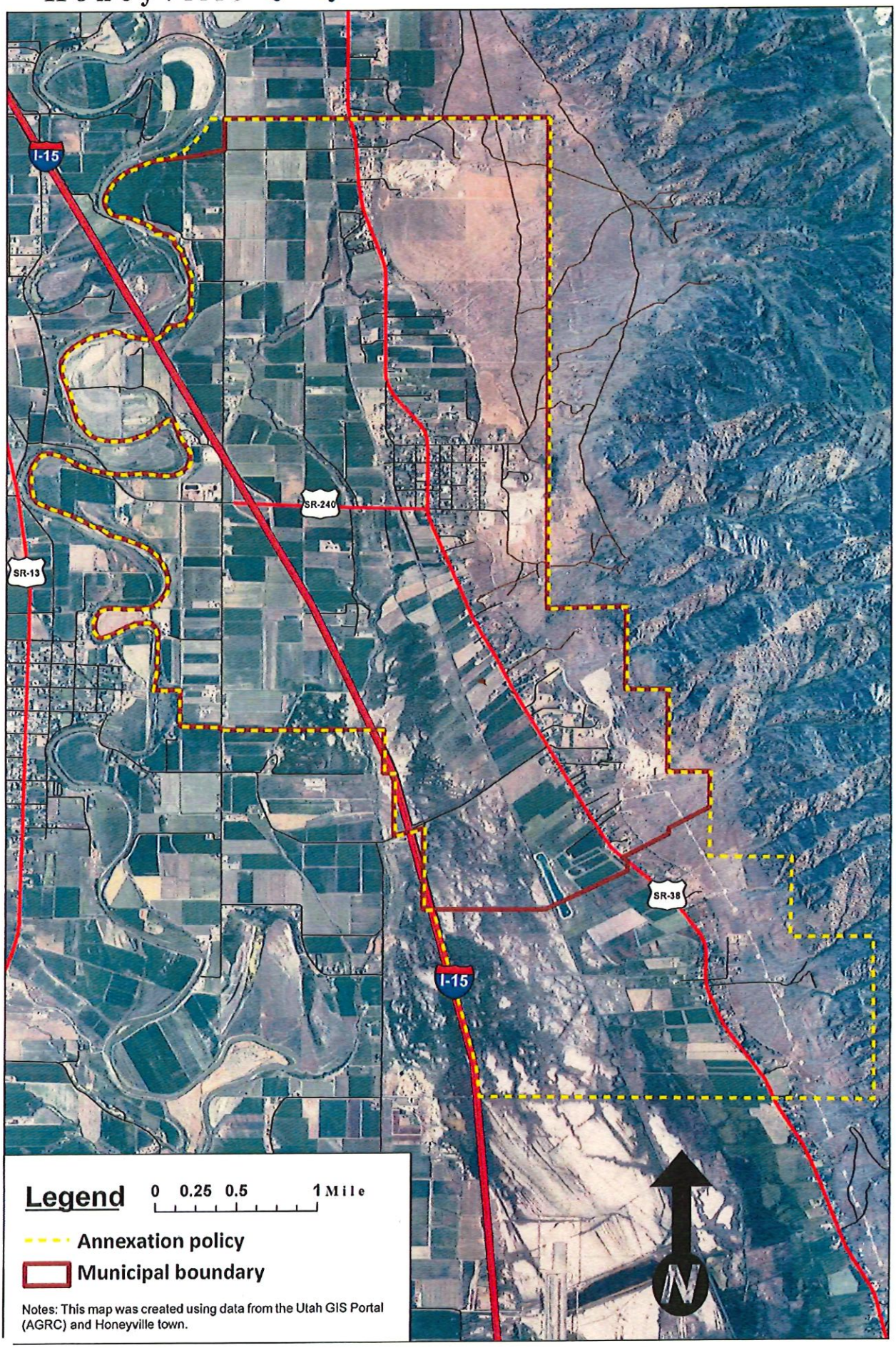
7/15/2026, 7:50:26 AM

- Mile Markers
- Railroads
- Cities
- Annexations
- Annex
- Parcel Labels
- Tax Parcels
- Subdivisions Labels
- Subdivisions
- County Zoning
- A-20: Agriculture District - 20 acres
- MU-160: Multiple Use District - 160 acres
- RR-2: Rural Residential District - 2 acres
- RR-5: Rural Residential 5 acres
- RR-20: Rural Residential District - 20,000 sq.ft.

1:18,547

0 0.1 0.2 0.4 mi

0 0.17 0.35 0.7 km

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Vantor

City of Honeyville Annexation Policy