

ZION CANYON

V I L L A G E

June 20, 2022

Dear Town Council:

Regarding the Ordinance Revision: Net Developable Area Standard that would exclude floodways and sloped areas in the calculus of allowable housing and lodging units in commercial zones, our organization is unequivocally opposed to the proposal due to the unintended consequences that would follow. We believe this would be detrimental to the Village atmosphere that the current Town Code effectively promotes and protects. In addition, it would harm the local economy and have a direct negative impact upon the tax basis for the Town of Springdale.

Related to transient lodging, this proposal seeks to address a relatively minor component as developable commercial land for this purpose approaches its limit while unfairly penalizing a few select properties. On the basis of "perceived density", which is difficult to define, it introduces vague and subjective terminology currently not found in the Town Code that sets a counter-productive precedence for future updates. In addition, it is reasonable to conclude that the intention of the current density standards (10-11A-7 and 10-11B-5) already accounts for the entirety of area including floodways and sloped areas. Two acres of developed land and no floodplain is objectively more dense than four acres with two acres developed land and two acres of floodplain. The open space these areas provide has a real effect upon the scale and atmosphere contribution of the property and shows that current standards are working.

Citing the recent findings of Springdale's Transient Lodging Task Force, visitors staying in Springdale (the "ideal" visitor) park their cars in guaranteed off-street parking and more frequently dine in our restaurants and shop in our shops, thereby contributing greater to local sales and transient room tax. One unintended consequence is certain: this revision would lead to fewer of the ideal Zion visitors and otherwise encourage more to stay in Virgin, La Verkin, Kanab, etc. This change will directly contribute to an increase in vehicular traffic congestion, the burden of which is one of the greatest disruptions to our Village atmosphere in Springdale.

Over the years, Springdale has done a phenomenal job in establishing standards that set this community apart from similarly tourism-adjacent destinations. Please consider the overall harmful effect this change to the Code would have, while simultaneously resulting in very little material benefit to the town, its business entities and residents.

Warm regards,

A handwritten signature in black ink that reads "Nate Wells". The signature is written in a cursive, slightly slanted style.

Nate Wells

General Manager, Zion Canyon Village