



118 Lion Blvd • PO Box 187 • Springdale, UT 84767 • (435) 772-3434

PLANNING COMMISSION NOTICE AND AGENDA
THE SPRINGDALE PLANNING COMMISSION WILL HOLD A WORK MEETING
ON WEDNESDAY, OCTOBER 4, 2023, AT 5:00 PM
AT THE CANYON COMMUNITY CENTER, 126 LION BLVD – SPRINGDALE, UT 84767

A live broadcast of this meeting will be available to the public for viewing/listening only.

****Please see the stream information below****

Approval of the agenda
General announcements

A. Discussion / Non-Action Items

1. Discussion of potential revisions to the Town's regulations of Accessory Dwelling Units
2. Discussion of potential regulations regarding light trespass from all light sources (including interior lighting) on commercial properties

B. Adjourn

***To access the live stream for this public meeting,
please visit or click the link below:**

<https://www.youtube.com/@SpringdaleTownPublicMeetings>

APPROVED Kelvin Tophan DATE 10/04/2023

The foregoing agenda was posted at the Springdale Town Hall at approximately 11:15 am on 09/29/2023
by R. Romero

NOTICE: In compliance with the Americans with Disabilities Act, individuals needing special accommodations or assistance during this meeting should contact Town Clerk Aren Emerson at 435.772.3434 at least 48 hours before the meeting.

Packet materials for this meeting will be available at: <https://www.springdaletown.com/agendacenter>



**MINUTES OF THE SPRINGDALE PLANNING COMMISSION WORK MEETING ON
WEDNESDAY, OCTOBER 4, 2023, AT 5:00 PM
AT THE CANYON COMMUNITY CENTER,
126 LION BOULEVARD, SPRINGDALE, UT 84767**

The meeting convened at 05:00 p.m.

MEMBERS PRESENT: Chair Kyla Topham, Commissioners Tom Kenaston, Pat Campbell, Noel Benson, Adam Hyatt, Terry Kruschke and Jonathan Shafer from Zion National Park

ALSO PRESENT: Director of Community Development, Tom Dansie; Principal Planner, Niall Connolly; Deputy Town Clerk, Robin Romero, recording; and Town Clerk, Aren Emerson. See the attached sheet for attendees.

MEMBERS EXCUSED: Commissioner Pam Inghram

Ms. Topham stated that Mr. Kruschke would be a voting member in Ms. Inghram's absence.

Approval of the Agenda:

Noel Benson made a motion to approve the agenda. The motion was seconded by Tom Kenaston, Campbell: Aye
Kruschke: Aye
Kenaston: Aye
Benson: Aye
Topham: Aye
The motion passed unanimously.

General Announcements: No general announcements

A. Non-Action Items

1. Discussion of potential revisions to the Town's regulations of Accessory Dwelling Units.

Mr. Dansie reviewed the three main topics the Planning Commission had discussed as a matter of focus in prior meetings. Those items included:

1. Should Accessory Dwelling Units (ADUs) be allowed in the Foothill Residential (FR) zone?
2. Should more than one ADU be allowed on a property?
3. Should caregivers or caretakers of a property be allowed to occupy a second residence and not be classified as an ADU?

Additionally, there had been discussion about the Planning Commission's desire to continue using the term ADU or if it should be changed to rental, guesthouse, rental second dwelling, or similar terms.

Mr. Dansie explained that public feedback had been requested, but only three comments had been received from the community. Due to the inadequate response, the Planning Commission discussed creating a community survey. He presented possible survey questions for the Planning Commission to review.

Mr. Benson asked if the ADU square footage requirements differed for Foothill Residential (FR) and Valley Residential (VR).

- Mr. Dansie stated that external ADUs in VR had a size limit of fifteen hundred square feet. External residential units were not allowed in FR.

Mr. Benson inquired if guest houses in FR had a square foot limit.

- Mr. Dansie explained that there was a five thousand square foot limit per building, allowing the possibility of having two structures, each with a five thousand square foot limit. This could include scenarios such as a five thousand square foot main house and a five thousand square foot guest house. The limit applied to both FR and VR zones.

Mr. Kruschke noted that the ordinance allowed for a significant number of building types, such as greenhouses, art studios, garages, etc. In theory, someone could construct multiple buildings if there was enough available land.

Mr. Benson suggested the Commission revisit using the term ADU before the survey went out to the community. ADU and guest house were often confused with each other and would make a survey difficult.

Mrs. Topham inquired about the need to change the ordinance or update the draft to reflect a terminology change.

Mr. Benson emphasized the importance of aligning the survey with the new terminology to avoid confusion.

Mrs. Topham concurred, highlighting the importance of clarity when seeking public opinions.

Mr. Benson pointed out that much of the received feedback centered around concerns of density and increased building, which was not the current topic of discussion. He highlighted the confusion arising from discussions about detached guest houses and ADUs. In the FR zone, an ADU could be up to fifteen hundred square feet, whereas a guest house could be up to five thousand square feet. The nomenclature was misleading.

Mr. Kruschke recalled earlier discussions where staff considered an ADU as a usage rather than a distinct building. In this scenario, a property owner could request a permit to rent their guest house, classifying it as an ADU. He sought a way to clarify this in the survey.

Mr. Campbell expressed concern about potential discrepancies between the Town and State terminologies, noting Mr. Dansie's previous statement that the Town wasn't obligated to adopt the State's terminology.

Mr. Benson mentioned Mr. Dansie's suggestion in a previous meeting to include a legend translating the two terminologies and maintaining alignment with the State's terminology.

Mr. Dansie had clarified that they could define a rentable attached guest house as an external ADU, aligning with state regulations. There were no compliance issues with the state ordinance. Any concerns were related to terminology. He emphasized that, globally, the term ADU was used, and the challenge was to familiarize people with the idea that in Springdale, a rental detached guest house held the same meaning as an external ADU to those outside the Town. Legally and in terms of compliance, there were no problems.

Mr. Campbell had conveyed the challenge of communication with other officials due to the use of different terminologies. While he found it easy to understand the difference between the Town's terms and the state's terms, he expressed concern that the variation could create difficulties when communicating with others.

Mr. Kruschke said he came across three variations in the ordinance for secondary dwelling units. He said he was interpreting the secondary dwelling unit as an umbrella term over a guest house, which was not rentable, and an ADU, which was rentable.

Mr. Campbell expressed that was the way he thought about it as well.

Mr. Benson emphasized that if they were to continue using the term ADU, it was crucial to clarify that it specifically referred to a rentable unit.

Mr. Cambell suggested that they used 'Accessory Dwelling Unit Guest House' and 'Rental Accessory Dwelling Unit' to differentiate between the two.

Mr. Benson said adding the word rentable could be used, but he was not exceptionally content with any of the options presented, but he said that it was more comprehensive.

Mrs. Topham acknowledged the need for clarification while also considering Mr. Campbell's concerns about aligning with state regulations. She expressed that discrepancies between state and Town Code terminology could lead to confusion. To address this, she suggested including a chart in the survey that clearly explained the definitions, aiming to minimize confusion and ensure alignment.

The Commissioners agreed that clear definitions were needed in the introduction.

Mr. Dansie interjected, noting the viability of the discussed options and emphasizing that an ADU referred to how the structure was used, not its original purpose. He illustrated with an example, stating that a structure initially designed as a garage could be repurposed as a greenhouse, guest house, etc. If it met the criteria for an ADU at any point, the owner could apply for and use the structure as an ADU.

Mr. Kruschke sought clarification on whether there was a process to change a structure from being designated as an ADU back to being categorized as a guest house.

- Mr. Dansie stated there was no process.

The Commissioners requested an introduction as part of the survey.

Mr. Kruschke suggested adding to the introduction that other buildings were allowed in FR, but not for the same uses.

Mr. Benson questioned why a structure more than fifteen hundred square feet could not be rented out long-term.

Mrs. Topham said it was written that way so as not to incentivize building two five thousand square foot homes.

Mr. Kruschke suggested that after obtaining the survey results and initiating the ordinance revision, the committee could consider discussing changes to the square foot limit. Additionally, he proposed exploring the option of allowing either one external ADU or one guest house but not both.

Mr. Benson recommended exploring the option of maintaining a cap on the overall square footage but allowing for the distribution of that square footage among different structures. This approach could prevent the concentration of, for example, two five thousand square foot structures and an additional fifteen hundred square foot structure on a single property.

Mr. Hyatt conveyed his reservations about the proposed approach, expressing concerns about having more buildings per property.

Mr. Dansie noted that the ordinance already only allowed for one guest house per property.

Mr. Benson inquired with Mr. Dansie about the prevalence of guest houses exceeding fifteen hundred square feet in size.

- Mr. Dansie responded that guest houses typically tended to be around fifteen to sixteen hundred square feet or less in size.

Mr. Benson suggested the idea of slightly increasing the ADU limit and capping guest houses at the same square footage, which could result in a decrease in overall density.

The Commissioners requested the Community Development staff to revise the draft survey questions and their order.

Q1 – Do you live in Springdale? Yes/No

Q2 – What zone do you live in? List of zones to choose from. Possibly include an 'I don't know' option.

Q3 – Add an open-ended question regarding understanding/experience with an ADU.

Move Q1 to Q4 – Do you believe increased allowance for ADUs in the Town will have a negative impact on any of the following: (Mark all that apply)

- Adjust option language for clarity. Add ranking for each option when answered.

Move Q2 to Q5 – Do you believe an increased allowance of ADUs in the Town will have a positive impact on any of the following: (Mark all that apply)

- Adjust language for clarity. Add ranking for each option when answered.

Move Q3 to Q6 – Do you feel ADUs are an effective way to provide more housing for key contributors in the community?

- Possibly add parenthesis with examples of the types of key contributors.

Move Q4 to Q7 – External ADUs are currently only allowed in the Valley Residential zone. Should the Town change the code to allow renting ADUs in the Foothill Residential zone?

Mr. Kruschke suggested, 'In which residential zones do you feel the town should allow external ADU's:'

- A) None
- B) Valley Residential
- C) Foothill Residential
- D) Both Valley and Foothill Residential

Move Q5 to Q8 – Currently, only one ADU is allowed per property. Should the Town change the code to allow multiple ADUs (internal and/or external) on a property?

Move Q6 to Q9 – If you believe the Town should allow multiple ADUs per property, which of the following additional standards regarding multiple ADUs on a property should the Town adopt? (Mark all that apply)

Move Q7 and Q8 to Q10 and Q11 – Remove the word 'secondary dwelling' and replace it with 'guest house'; reword language to clarify that a long-term caregiver or caretaker could occupy the ADU or the main house. Clarify that an occupant referred to the owner as the occupant.

Move Q9 to Q12 – What other comments regarding ADUs would you like the Planning Commission to consider as they discuss this issue?

Mr. Kenniston referred to a public comment letter from resident Rich Swanson and acknowledged that there were comments within it that he found compelling.

Mr. Benson said that the new opening for the survey, clarifying that the goal was not to increase structural density, would contribute to shaping the comments received.

2. Discussion of potential regulations regarding light trespass from all light sources (including interior lighting) on commercial properties.

Mr. Dansie highlighted the Town's success in regulating outdoor lighting and achieving recognition as an International Dark Sky Community. However, concerns were raised about interior lighting contributing to light pollution, prompting the Town Council and Planning Commission to consider ways to mitigate its impact on the dark sky. In approaching this issue for the first time, Mr. Dansie suggested the Commission ponder whether interior lighting was a problem, if resources should be allocated to address it, and the best approach for mitigation. Mr. Dansie stated he did not believe it was appropriate for the Town to try to regulate interior lighting and advised against applying outdoor lighting standards to interior lighting, as it would not be effective or appropriate to regulate interior lighting the same way. He emphasized the need to focus on mitigating light escaping from structures and its impact on the night sky. Mr. Dansie recommended that any regulation considered should concentrate on lessening the escape of light from structures rather than regulating how interior lighting is used.

Mr. Dansie presented two approaches to mitigate light escape from structures. The first method involved implementing a standard during building construction, requiring light blockage through measures like tinted windows, window coverings, or mechanical barriers. This could be documented easily during the building process but relied on individuals' behavior and was not enforceable. The second approach was to establish a quantifiable standard for the total amount of light emitted from a property, avoiding regulation on how the light was emitted. This method allowed flexibility for property owners to comply without installing barriers like window blinds. However, it was more complex, requiring additional resources and technical expertise for enforcement. Mr. Dansie mentioned that Mr. McKee, the Code Enforcement Officer, had initiated work on a method to measure light trespass if the Commission wished to explore that option.

Mr. Campbell questioned how the Town could justify regulating the types of light barriers within businesses if it couldn't regulate what transpired inside those establishments.

Mr. Campbell asked if the Town cannot regulate what happens inside their business, how can they justify regulating what types of light barriers they have?

- Mr. Dansie acknowledged the validity of Mr. Campbell's point, stating that the goal wasn't to dictate what owners could or couldn't have but to raise awareness about excessive light emission. The intention was to encourage owners to limit light emission using some form of barrier. He agreed with Mr. Campbell that extending this to regulating internal business activities would be inappropriate. Mr. Dansie clarified that the ongoing discussion pertained specifically to commercial lighting and did not include residential properties.

Mr. Campbell pointed out, based on his reading of case law on light trespass, that the term "trespass" was avoided since light was considered intangible and, therefore, could not legally trespass. Instead, the phrase "light pollution" was commonly used in legal discussions.

Mr. Kruschke shared that unless the ordinance had changed since 2006, when he was building his home, he was required to demonstrate that his window shades worked before he was provided with a Certificate of Occupancy.

Mr. Campbell articulated that after researching national case law, he found that if a property owner challenged something like that in court, the Town would most likely lose.

Mr. Hyatt conveyed his strong reluctance to advance this proposal, expressing discomfort with the idea of intervening within a building or instructing a property owner to close their blinds, despite his desire to protect the night sky.

Mr. Kruschke concurred, emphasizing that his initial reaction to the potential ordinance revision was discomfort with regulating inside someone's property. He expressed a lack of interest in such an approach.

Mr. Campbell conveyed that he had reviewed the technical report from the Code Enforcement Officer about the method to measure light and described it as nightmarish.

Mrs. Topham inquired about option two and how it would be enforced.

- Mr. Dansie shared that Code Enforcement varies between proactive and reactive approaches based on the situation and severity. If the issue becomes an ordinance, the preferred method would be determined by the Town Council.

Mrs. Topham questioned whether, if they decided to move forward with the ordinance, it would be retroactive or only apply to those moving forward.

- Mr. Dansie explained that it could be either, but generally, land use ordinances were forward-looking and not typically applied retroactively.

Mrs. Topham also expressed discomfort with the potential ordinance and acknowledged the need for regulation due to obtrusive windows and lighting. However, she felt uneasy about intruding into businesses and owners' livelihoods. If they chose to proceed, she suggested looking at window size as an option. Additionally, she inquired whether the technical information provided by Mr. McKee was from someone already using it or if he was developing the method himself.

- Mr. Dansie responded that Mr. McKee's approach wasn't found in other communities he spoke to. While other places did measure light trespass, they used hand-held light meters, which may not be effective for the Town's specific circumstances.

Mr. Campbell stated that he did not like the idea and expressed uncertainty about how they could defend it.

Mr. Kruschke acknowledged the Town's success in preserving the night sky but suggested canceling the proposed ordinance. Based on his observations, he questioned whether the observed glow was actually from the Town or surrounding communities. He also expressed concern about discussing the topic during the upcoming holiday lighting period. He proposed a staff experiment before and after holiday lights to assess the impact and suggested shortening the duration of holiday lights. He felt that it would be a complicated and difficult process with a lot of community input with minimal impact in the long run. He indicated from a personal standpoint that he couldn't vote in favor of the discussed ordinance if they did not look into the other items first.

Mr. Dansie said that they could adjust the holiday lighting season if interested. The dates had been adjusted in the past, so there was precedent for making the change.

Mr. Benson shared his perspective that the proposed ordinance was not aimed at addressing the type of light pollution associated with holiday lighting but rather focused on localized situations affecting residents near commercial properties. He highlighted how residents living close to commercial light sources experienced a reduction in their ability to enjoy their properties and the dark sky community. Mr. Benson emphasized that the requirement for an interior light source in a new commercial property to be not visible from the outside was a straightforward measure aimed at addressing these concerns.

Mr. Hyatt raised the consideration of how to address a commercial building that existed before the residential property in the context of the proposed ordinance.

Mr. Benson countered, stating that it would only apply to ten or fewer properties and didn't perceive it as a significant burden for businesses.

Mr. Kenniston expressed his concern about light pollution but suggested that a more successful approach to address the issue might be through education and communication, rather than relying on enforcement or ordinances.

Mr. Benson reiterated that the concern being addressed pertained to external light emitted from a commercial property, not the lighting inside the building itself.

Mr. Hyatt suggested that engaging in a conversation with the owner/operator of the business might be a better step, although he acknowledged that success in such discussions wouldn't always be guaranteed.

Mrs. Topham proposed a "Know Better, Do Better" type of campaign to inform and educate the community about light pollution and its impact on residents dealing with external light emissions from businesses. She suggested that, although the majority was leaning toward shelving the discussion, they all shared concerns about the significance of light pollution.

Mr. Kenniston suggested sending out a reminder, given the Town's designation as a dark sky community, emphasizing the importance for both residences and businesses to take measures to control their light pollution.

Mr. Kruschke proposed using the Good Neighbor policy approach to distribute communication and gauge whether people could voluntarily be influenced before considering the implementation of an ordinance.

Mrs. Topham suggested making an effort to issue a compelling call to action through the newsletter or another communication channel, given that it would only affect new buildings moving forward.

Mr. Dansie shared that with the fall season's earlier darkness, outdoor lighting issues were becoming more noticeable. The Code Enforcement Officer had already been focusing on outdoor lighting through an educational campaign when contacting property owners. Mr. Dansie suggested incorporating information and education about interior lighting into this effort as well.

B. Adjourn

Motion made by Terry Kruschke to Adjourn at 6:52 p.m. The motion was seconded by Tom Kenniston.
Campbell: Aye
Kruschke: Aye
Kenaston: Aye
Benson: Aye
Topham: Aye
The motion passed unanimously.



Kelvin Topham

Robin Romero

Robin Romero, Deputy Town Clerk

DATE: 11/15/2023

A recording of the public meeting is available by accessing the Town's YouTube channel at <https://www.youtube.com/@SpringdaleTownPublicMeetings>.



PO Box 187 118 Lion Blvd Springdale UT 84767

ATTENDANCE RECORD
Please print your name below

Meeting PLANNING COMMISSION WORK MEETING Date 10/04/23

ATTENDEES:

GIL KIEFER
Name (please print)

Name (please print)

MAX GREGORIC
Name (please print)

Name (please print)

Betina Lindsey
Name (please print)

Name (please print)

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Dear Tom and the Planning Commission,

Thank you for asking for our input on the ADU's. I am okay with having an external ADU in the foothill residential zone for more affordable housing, and hope people will be reasonable with the rent to help with the housing constraints and high prices here in Springdale. Regarding the 2nd question – should more than one be allowed. I would like to see just one ADU per property so we don't get over built too much here in Springdale. Also it is important to conserve open space for the wildlife here and remember that the more we build, the more water is being used and we are all called to conserve on water. Please keep in mind when building ADU's, that native plants and flowering plants are important for hummingbirds, bees, butterflies etc. for pollination and these plants should be preserved as much as possible and not removed too much as this is an important part of our eco system here in Springdale. Not to mention, we still need open space for roaming wildlife.

Thank you for listening.

Cheri Ikerd



Thanks for asking for feedback.

I am opposed to the ADU changes that are being considered in the foothill residential zone by the planning commission as they are counter to the intent of the foothill residential zone as defined in section 10-9A-1 of the town ordinance.

Per section 10-9A-1V: The foothill residential zone is intended to allow for open space, low density, and low-profile single-family dwellings... Allowing external ADU's will negatively impact each of the forementioned intents.

Negative impact on "open space"

Allowing external ADU's will encourage the development of additional buildings that can be up to 1,500 square feet. The town currently limits the size of the primary dwelling on the property to 3,000 square feet. With the addition of an ADU, the allowed combined dwelling size will increase from 3,000 square feet to 4500 square feet. The increase in the combined dwelling size along with the required space between buildings and additional parking space will greatly reduce the available open space within the FR zone.

Negative impact on "low density"

Allowing external ADU's will essentially allow for the equivalent of a two-family or duplex dwellings and would double the density within the FR zone. The town has minimum acreage requirements that limit the population density within the zone which limits the impact on the surrounding landscape. The higher density will result in more disturbance to the landscape and the wildlife in the area.

Many of the roads within the FR zone are narrow private roads that cross over neighboring properties. The increase in population will result in an increase in traffic, noise level, and wear-and-tear for lots that have a common private road on their property. Neighboring properties will be negatively impacted by the increase in traffic from external ADUs.

Impact on "low-profile single-family dwellings"

External ADU's will create more urban sprawl on the lots in the FR zone. This will negatively affect the look of the FR zone by creating properties that resemble more of a military compound versus the desired single-family look. I have experienced the impact of ADU development in neighborhoods in California. It changed neighborhoods from having backyards with trees and open space between houses. And created dense neighborhoods due to the removal of the trees and elimination of open space to accommodate the construction of new ADU's. I do not want to see that occurring in Springdale.

It can be argued that not all properties will add an external ADU. But the above issues will occur for any property that is next to one or two neighboring properties that do add external ADU's. And once the ordinance is changed it cannot be undone when issues occur and will only get worse with time.

My other concern is how the ADU codes can be enforced. We already have two homes on Valley View Drive that are advertising on Vrbo for rental periods that do not meet the 90 day

minimum rental period. This shows how individuals are wanting to develop ADU's for longer term transient housing vs. actual long-term rentals.

Furthermore, how is the city going to determine if the ADU is being rented or if they just have a lot of friends visiting? It becomes the job of neighbors to try to police the activity and alert the city if a violation is suspected. This puts undo stress on our citizens and will cause issues between neighbors.

Overall when moving to Springdale, I choose a location in the FR zone because of the zoning rules and the intent of the FR zone as defined in the city ordinances. The ADU changes being considered by the planning commission would essentially rezone the FR area by allowing for two-family homes which will have a large negative impact on the area. The current zoning ordinances have protected the scenic beauty of the foothill residential zone and should not be modified.

Finally, for many of the same reasons I described above, I do not recommend allowing for more than one ADU per property in any residential zone. Doing so would create multi-family properties which will negatively impact the neighboring properties and the neighborhoods.

The town has worked hard to maintain the current look and feel of it's neighborhoods. We should not sacrifice that work by essentially re-zoning our residential area's to increase the allowed density. I have seen the negative impact of such changes in California and do not want to see that repeated in Springdale.

Regards,

Rich Swanson



What's Wrong with Open Space?

Some questions follow.

How many more than one ADU? 3? 5? Or maybe we should take California's lead and allow 10? What is enough?

I mention California because I have seen first-hand the rapid destruction of single family neighborhoods that is going on there as every single tree in sight is bulldozed to make way for maximum density housing with no open space on lots where a single home once stood. You might think that we're just going to start with a few ADUs, but this is headed in the exact same direction as California in time. And while all of this is going on, did housing become more affordable in California? No, quite the opposite.

Will there be setback requirements? How close to the lot line are you planning on letting homeowners build these multiple ADUs? Will there be a percentage of land that cannot be developed? How many stories are you going to allow each structure to be? You are proposing a rezoning that would mean lots that currently have privacy will no longer exist.

What about parking? How will the excess cars that come with each unit be handled? Because the likelihood that each unit will come with only one car is slim. Will they have to provide parking for more than one car? If so, where? Enclosed garage space? Or just piled up in a driveway? If not, are the neighbors supposed to be okay with countless cars parked along the street?

And what about infrastructure? Do we have an electrical grid capable of supporting this? How about water? Aren't we already hearing talk of water conservation? How about our sewer capacity?

Is the town expecting these to be used as short-term rentals? If not, how are you going to manage that? Presently, I have two neighbors just on my own street that each have their homes listed on VRBO – and neither one is listing their property at the current regulation of greater than 90 days. And one of those has had their property listed on VRBO this way for well in excess of a year. Given this, it seems the town already is unable to manage rentals that do not meet regulations. How do you propose to manage this when you've opened this up to every single homeowner with multiple structures on their property? You can say we have a regulation of more than 90 days, but if that regulation is not going to be enforced – for whatever reason – then it really is a meaningless regulation.

There has been so much building and development in just the past two years. And yet, it isn't enough? And with all of this development, what amenities have been brought to the town? New restaurants? Anything that makes the lives of the residents who live here better? Let me quote some tourists that I overheard at one of our coffee shops this past summer, “This town is nothing but a bunch of E bike rentals.” I don't disagree with them. Springdale has become a town full of rentals for tourists and overrun with E bikes.

I am so saddened by what Springdale has turned into in just the past two years. I never expected this town to turn into this when I decided to buy here – never. But at least I still had open space and privacy being in FR. And now you're proposing eliminating that too and turning it into more of what is lining SR9. You've turned Springdale into a mini Los Angeles or San Jose, minus any of the amenities that come with those cities.

And let's at least be honest with the residents of Springdale – this is rezoning without going through any kind of rezoning process. You are taking a residential area – whose original intention was to maintain some open space with its acreage requirements and limits on housing size – and turning it into multi-family dwellings.

And let's be further honest, none of this will do a single thing to make housing affordable for any employee who works in the park or in Springdale. These are just going to be used as yet more rentals – for tourists.

Enough is enough. I am absolutely opposed to this rezoning of FR to become yet another area filled with multi-family dwellings and strongly suggest that we do not allow any external ADUs in FR.

Sue Swanson

