



**Memorandum**

**To: The Planning Commission**  
**From: Niall Connolly, Director of Community Development**  
**Date: April 10, 2026**  
**Re: Application for the Workforce Housing Overlay Zone at 120 Kinesava Drive**

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**Introduction**

Kathy LaFave has applied for a zone change on her property at 120 Kinesava Drive. The current zoning on the property is Foothill Residential. Her request is for the Workforce Housing Overlay Zone to be applied to her property. Because this is a zone change application, approval of the Town Council is required. The Planning Commission should review this application and make a recommendation to the Town Council.

Section 10-13G of the Town Code sets out the details of the Workforce Housing Overlay Zone. The purpose of this overlay zone is as follows:

*This ordinance is adopted to help facilitate the availability of attainable housing options for employees working in Springdale and Zion National Park. The Town finds that having employees of local businesses live in the community strengthens the community and adds to the Town’s village character.*

The workforce housing overlay zone allows the following uses:

- Duplex or single family housing, if all the units in the development project are individually owned and owner occupied.
- Multi-family housing, if all the units in the development project are under common ownership and are rented to tenants.

The property currently contains one, single family home. Ms. LaFave is applying for the overlay zone so that she can build one, additional single family home on the property. If the overlay zone is applied on the property, she would then subdivide the lot, so that there would be one home per lot. Both homes (i.e. the proposed new home and the existing home) would be deed restricted so that they must be occupied by “qualified households”, as defined in Section 10-13G of the Code.

**Legislative Decisions v Administrative Decisions**

Zone changes are legislative decisions, rather than administrative. Therefore, first and foremost, a zone change application must meet the required application standards. However, meeting the application standards does not automatically mean the zone change will be approved. For legislative decisions, the Town Council must use its discretion to determine whether or not the proposed zone change would

promote the aims and objectives of the General Plan. The Commission may wish to refer to sections 10-3-2A, 10-3-2B and the introductory paragraph of 10-13G-9 for further guidance on this point.

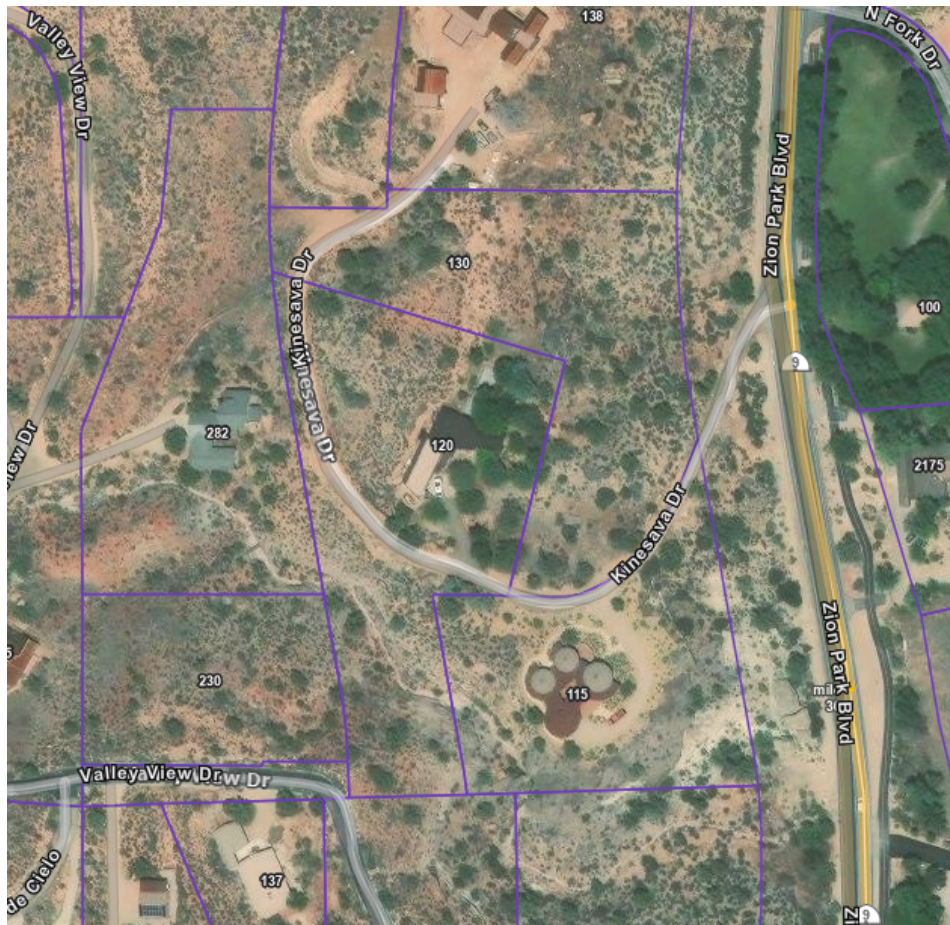


Figure 1. Aerial view of the subject property (no. 120). Purple lines indicate the property lines

### Application Standards

The table below lists the relevant application standards alongside the applicant’s submission.

Application Standard	Proposal at 120 Kinesava Drive	Compliance?
10-13G-3: Uses allowed in the Workforce Housing Overlay Zone	Two, individually owned, single family homes.	Complies.
10-13G-4(A): 75% of dwelling units must be occupied by “qualified households” (see 10-13G-2: Definitions)	Ms. LaFave works full time in Springdale, and so her home is a “qualified household”.  The future owner of the proposed new house has not	The new home will need to be occupied by a qualified household. The development agreement ties the property to the terms and conditions of the WFOZ. The sale of the new lot

	<p>been confirmed. If the zone change is approved, the property owner and the Town will enter a development agreement to ensure the terms and conditions of the Workforce Housing Overlay zone are applied.</p>	<p>will be subject to this agreement. Complies.</p>
<p>10-13G-5: Qualified Household Standards. The maximum number of people that may be part of a qualified household is two per bedroom if the household occupies a unit with multiple bedrooms.</p>	<p>The existing home has two bedrooms and two occupants.</p>	<p>The proposed new home would need to comply with this standard. The development agreement would tie the property to these requirements.</p>
<p>10-13G-6: Allowed Density. For single family, owner occupied homes, 8 units per acre maximum. Areas in floodways and those with 30% slope or greater are excluded from density calculation</p>	<p>The property is about 2.2 acres in size. The applicant has not provided the area of the property when 30% slopes are deducted. However, a survey drawing is provided which shows the slopes which exceed 30%. Based on this map, staff has calculated that approximately 37% of the property is on steeper slopes and therefore should be excluded from the density calculation. The remaining area is approximately 1.38 acres. At 8 units per acre, the maximum allowable density would be 11 units. Two units are proposed.</p>	<p>Complies.</p>
<p>10-13G-7: Deed Restriction</p>	<p>The applicant has indicated in their application pack a willingness to record a deed restriction, as per section 10-13G-7(A).</p>	<p>Complies.</p>
<p>10-13G-9: Zone Change Criteria:  <b>A. <i>The property where the workforce housing zone is</i></b></p>	<p>The applicant has stated the following:  The property is over 2 acres and is large enough to</p>	<p>The Planning Commission should determine whether or not this standard has been met.</p>

<p><i>proposed is large enough to accommodate the proposed workforce housing development, associated parking and other development, and comply with all land use and development standards in a manner that is consistent with the Town's village character, as defined in the General Plan.</i></p>	<p>accommodate 2 separate single family homes. There is no guest house or other outer building on the existing property.</p>	
<p>Zone Change Criteria</p> <p><b>B:</b> <i>Proposed development on the property will not be located on a hilltop, ridgeline, or the edge of a mesa.</i></p>	<p>A pole test was carried out by the Director of Community Development, which determined that the new lot would not be on a hilltop, ridgeline or the edge of a mesa (in other words, would not be a high visual impact lot).</p>	<p>Complies</p>
<p>Zone Change Criteria</p> <p><b>C:</b> <i>The property where the workforce housing zone is proposed has sufficient vehicular access to accommodate the increased vehicular traffic the proposed development is projected to generate.</i></p>	<p>The applicant has stated the following:</p> <p>The lot has sufficient vehicle access as there historically were 4 individuals that lived at 120 Kinesava Drive. Now that children have grown, there are typically only 2 persons living there. The home above that lot is a part time home and has very little traffic.</p>	<p>Kinesava Drive has very low traffic flows. There are currently three residences on Kinesava Drive. The proposal would add one additional home. There is also one undeveloped parcel on Kinesava Drive.</p> <p>The Planning Commission should determine whether or not this standard has been met.</p>
<p>Zone Change Criteria</p> <p><b>D:</b> <i>Recognizing that the intent of the workforce housing overlay zone is to allow residential development at greater density than what is otherwise allowed in the residential zones, if the proposed project is located in or adjacent to a residential zone the applicant must propose</i></p>	<p>The applicant has stated the following:</p> <p>In order to minimize impacts on the neighbors the proposed new home would have a garage built partially underground as a walkout garage, and the home would be a single story home. The home would meet all</p>	<p>The applicant has submitted a drawing that indicates the placement of the proposed new home, and the broad design principles it will follow. The ultimate design of the house will not be determined until the DDR stage. The Commissioners may wish to visit the site to get a sense of how the proposed new home would fit in its</p>

<p><i>strategies that will be included in the development of the property that will mitigate impacts on surrounding properties in terms of loss of viewshed, loss of privacy, or other similar impacts.</i></p>	<p>required height limitations.</p>	<p>context. The applicant has indicated to staff that she is willing to accommodate site visits from planning commissioners.</p>
<p>Zone Change Criteria</p> <p><b>E:</b> <i>The workforce housing units in a proposed development must be indistinguishable from market rate housing units in the same development in terms of exterior design and finishes.</i></p>	<p>The applicant has stated the following:</p> <p>The design of the home will be consistent with other homes in the neighborhood.</p>	<p>Because the proposed development consists of one, new single family home, and not a larger multifamily building, it is unlikely to be distinguishable as workforce housing.</p>
<p>Zone Change Criteria</p> <p><b>F:</b> <i>There must be consistency in the unit size and number of bedrooms per unit between workforce housing units and market rate housing units in the same development.</i></p>	<p>The applicant has stated the following:</p> <p>The new home will be consistent in size to the other homes in the neighborhood.</p>	<p>The existing home is a two bedroom unit. The proposed new home would be of a similar size.</p>
<p>10-13G -10: Limitations</p> <p>This section lists the limiting standards which are applied to properties in the WFOZ.</p>	<p>The applicant has stated the following:</p> <p>We acknowledge that no transient lodging is allowed. Both homes will be primary residence. We will adhere to all requirements for limitations.</p>	<p>The development agreement would tie the property to these requirements</p>
<p>10-13G-11: Development Criteria</p> <p>This section sets out development standards for the WFOZ, including setbacks, maximum building height etc.</p>	<p>The proposal is not sufficiently detailed at this stage to confirm that all these standards have been met. However, there is nothing unusual about the property that would prevent compliance with these standards.</p>	<p>DDR approval will be required before a new house is built. During that process, it will be possible to ensure that all relevant standards are met.</p>

**General Plan**

The Commission may wish to refer to Chapter 3.0 (Housing) of the General Plan. The general goal is as follows:

**GENERAL GOAL:** Springdale will retain its rural residential character by protecting existing residential neighborhoods from the impacts of increased commercialization. The Town will have housing options that support a diverse population, including low density residential units, higher density multi-family units in select locations, accessory dwelling units, and others. This will allow the Town to maintain housing for a community with families of diverse income. It will benefit local businesses by providing a larger labor pool. It will benefit the Town by having the people who are working in businesses also be committed and contributing members of the community by having access to attainable housing.

Sub-goal A is:

“Maintain Springdale’s character as a rural residential community.”

And sub-goal B:

“Promote community character by providing opportunities for more key contributors to the community (first responders, teachers, business owners/ managers, etc.) to live full-time in the community.

**Planning Commission Action**

The Planning Commission should discuss this application and make a recommendation to the Town Council on whether or not the Workforce Housing Overlay Zone should be applied to this property. The Commission may wish to review Sections 10-13G of the Town Code. The following sample language may be used:

*The Planning Commission recommends that the Town Council approve/ deny this zone map amendment application, which would apply the Workforce Housing Overlay Zone to the property at 120 Kinesava Drive. The is based on the following findings:*

*(List Findings):*

## **Appendix: Application Documents**

We are requesting a zone change from Foothill Residential to Workforce Housing Overlay Zone. We have both long been in support of effort to provide housing to people that work in our community. When on Town Council Kathy was the point councilman working on developing the Red Hawk Apartments. We applaud the Planning Commission and Town Council for creating a overlay zone that will provide an avenue for more employees of the Town of Springdale to live and be part of the community. We currently have a single family home located at 120 Kinesava Drive. The home is much small than allowed and there are is no external guest house, barn, or garage. We feel we have made a small foot print. Now we would like to divide our lot it to no more than 2 lots total. That would allow us to sell one lot allowing a current employee of the Town of Springdale an opportunity to live in the community. We also recognize that this will also deed restrict both homes in the future. We feel this meets the objectives of the general plan by providing housing to employees of the Town of Springdale.

## Chapter 13

### Article G – Workforce Housing Overlay Zone

This ordinance is adopted to help facilitate the availability of attainable housing options for employees working in Springdale and Zion National Park. The Town finds that having employees of local businesses live in the community strengthens the community and adds to the Town's village character.

#### 10-13G-3 – Allowed Use

The Workforce Housing Overlay Zone allows multiple uses. In this application we are requesting that the property be divided into two separate lots for two separate single family homes. We are willing to deed restrict that we do not wish to add any additional lots. No transient lodging will be uses on either lots.

#### 10-13G-4

At least 75 percent of the dwelling units in this overlay zone must be occupied by qualified households where at least one adult is actively employed. In the case of the current home located at 120 Kinesava Drive one adult is current actively employed as defined by the code. The second lot will have to meet the same criteria.

#### 10-13G-5 Qualified Household Standards

The maximum number of people that may be part of the existing home at 120 Kinesava Drive is 4 because it is a 2 bedroom home. Currently 2 individuals live in that home. The additional home would adhere to these standards as well.

#### 10-13G-6 Allowed Density

A. Allowed united per acre is 8 units. We have slightly more than 2 acres. We feel any more than 2 single family residents would be too large of an impact on our neighbors. Therefore, we are willing to deed restrict this property to no more than 2 single family homes.

B. N/A

C. No 30% natural grade areas will be disrupted.

#### 10-13G-7

We will have both lots deed restricted in accordance with this Overlay Zone. A restrictive covenant will be filed with the Washington County Recorder's Office that stipulates the units must be sold or rented to qualified households.

#### 10-13G-9

A. The property is over 2 acres and is large enough to accommodate 2 separate single family homes. There is no guest house or other outer building on the existing property.

B. The new development would not be on a ridgeline, hilltop, or edge of a mesa.

C. The lot has sufficient vehicle access as there historically were 4 individuals that lived at 120 Kinesava Drive. Now that children have grown, there are typically only 2 persons living there. The home above that lot is a part time home and has very little traffic.

D. In order to minimize impacts on the neighbors the proposed new home would have a garage built partially underground as a walkout garage, and the home would be a single story home. The home would meet all required height limitations.

E. The design of the home will be consistent with other homes in the neighborhood.

F. The new home will be consistent in size to the other homes in the neighborhood.

#### 10-13G-10 Limitations

We acknowledge that no transient lodging is allowed. Both homes will be primary residence. We will adhere to all requirements for limitations.

#### 10-13G-11 Development Criteria

All sets backs and other development criteria will be met.

#### 10-13G-12 Development Agreement

A Development Agreement will be entered into with the town and recorded with the County of Washington's Recorder's Office.

The site map attached is of the existing property know as 120 Kinesava Drive (S-Kara-1) and is border on all sides by the foot hills residential zone.



