



## **Memorandum**

**To: Planning Commission**  
**From: Niall Connolly, Director of Community Development**  
**Date: May 1st, 2026**  
**Re: Wildland Urban Interface Code - Knock-on Effects to the Town Code**

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### **Introduction**

The Planning Commission has previously discussed the State's mandate to adopt the Wildland Urban Interface (WUI) Code. The Town will be adopting this Code imminently. Some of the provisions of the WUI Code may potentially conflict with existing development requirements in the Town's Code. Staff recommends that the Commission discuss these potential conflicts, to determine whether changes to the Town Code will be necessary.

The WUI Code is built around three pillars:

1. *Access and Water Supply*
2. *Building Construction*
3. *Defensible Space and Fuel Management*

The second and third pillars are where conflicts with our Land Use Code most likely exist.

### **Potential Conflict 1- Building Construction (materials)**

Section 10-16 of the Code (Architectural Standards and Design Guidelines) lists building materials which are approved, and those which are prohibited. As the Town adopts the WUI Code, it would make sense to align the approved materials with the WUI Code. The Code allows wood siding, wood roof shingles and wood for fascia/ soffit details. These materials are not fire rated, and so the Commission may wish to consider removing these from the list of approved materials.

Fiber Cement Siding (also known as "Hardie Board" siding) is not specifically listed as an approved material. But neither is it listed as prohibited. Hardie Board is fire rated, and is used extensively in Town. If the commission decides to remove wood siding from the approved list, it may be worth adding fiber cement siding to the approved materials list, as a fire rated alternative.

### **Potential Conflict 2- Defensible Space**

Defensible space refers to an area surrounding a building which is kept free of flammable materials. The size of the required defensible space depends on the severity of the fire hazard in the area. The table below shows this:

WUI Area	Fuel Modification Distance
Moderate Hazard	30 ft
High Hazard	50 ft
Extreme Hazard	100 ft

**Figure 1. Defensible Space Requirement**

This distance can potentially vary depending on the terrain surrounding a building. Maintaining a defensible space clear of flammable materials may, in certain instances, be at odds with the Town’s landscaping requirements. In particular, the Town requirement to replace any removed native vegetation taller than 6 ft with two replacements. This requirement is in section 10-15B-4(A):

*10-15B-4: - GRADING DESIGN:*

- A. *The following significant natural features must be preserved during all grading and construction activities:*
  1. *Rock ledges and outcrops greater than six feet in height.*
  2. *Boulders greater than ten feet in diameter.*
  3. *Native vegetation greater than six feet in height. If preservation of such vegetation is not feasible, the vegetation may be removed. **In such a case, two replacement plants of the same or similar species, as approved by the DCD, must be planted elsewhere on the site. These replacement plants shall be in addition to any landscaping required by chapter 18 of this title and any revegetation required by section 10-15B-8 of this chapter.***
  4. *The top of bank to top of bank area of all washes which are mapped as Special Flood Hazard Areas by the Federal Emergency Management Agency on the Flood Insurance Rate Map (FIRM) or on the Draft Hydraulic Work Maps for Springdale, except as permitted in the circumstances described in section 10-15B-14 of this chapter.*

**Figure 2. Town’s Tree Replacement Requirement (with Emphasis Added)**

Some undeveloped lots have many trees that need to be removed once they are developed. It is not uncommon for new homes on such lots to be required to plant a substantial amount of replacement trees. Due to space constraints, many such replacement trees end up in very close proximity to the house, and to each other. While trees are not prohibited in the defensible space area, according to the WUI Code, their crowns must be at least 10 ft apart, and clear of all overhead power lines. Regular clearing of leaves, needles and other plant debris is also required. In addition, some native species, such as junipers, are particularly flammable. It is likely that this requirement will routinely conflict with WUI Code compliance.

In addition, the Code (section 10-18-4C) includes a minimum number of trees planted per landscaped area:

*Quantities required: Landscape areas shall contain the following quantities of trees, shrubs, and ground cover.*

1. *Trees:*
  - a. *For properties in commercial and public use zones: The greater of one tree for every 1,000 square feet of landscape area, or ten trees.*
  - b. *For properties in residential and agricultural zones: One tree for every 1,000 square feet of landscape area.*

**Figure 3. Excerpt from Landscaping Chapter**

This requirement is less likely to lead to direct conflicts with the WUI Code. However, it is possible that occasionally this could present a problem for WUI compliance.

### **Options**

There are various options the Planning Commission could explore to address these potential code conflicts. Here are some to consider:

- Editing the approved building materials that are listed in Chapter 16 to remove wood siding, wood shingle roofs and wood soffit/ fascia boards. Consider adding fiber cement siding as an approved material.
- Deleting the 2:1 tree replacement requirement.
- Keeping the 2:1 tree replacement requirement, but allowing for a relaxation of the requirement where a WUI conflict arises.
- Deleting the minimum tree quantity requirement
- Keeping the minimum tree quantity requirement, but allowing for a relaxation of the requirement where a WUI conflict arises.

Staff recommends that if relaxations are allowed in certain circumstances, those circumstances should be defined. Staff would caution against an over reliance on requirements that rely heavily on maintenance/ pruning being carried out by an individual property owner, as this is likely to result in an increased code enforcement burden. Staff also recommends that the Commission bear in mind the landscape, visual and ecological benefits that have accrued from the Town's existing policies on tree planting. This should be considered in conjunction with ensuring compliance with the WUI Code, and keeping our community safe from wildfires.

The Planning Commission should discuss the potential code conflicts described above, and consider ways that they could be addressed.