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Public Comment for Luke Wilson's Parking Lot (8/19/26)

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First off, I'd like to thank everyone on the Planning Commission for your dedication and hard work. As I know first hand how hard it can be to evaluate the merits of many of the items that come before you. This is one of those items. Thank You for your service.

I believe the Commission's prior decision to require a geologic study for S-138-A-2 is an appropriate action for this parcel.

There are a number of factors to consider in this parking lot expansion, not the least of which is the fact that Luke has accomplished this parking lot expansion without first applying for required permits. This makes it more difficult to evaluate the project since the land has been disturbed without supervision.

Unfortunately, this is not the first time Luke Wilson has graded a property without a permit. In fact, he paid a fine a few years ago for unauthorized grading on the Balanced Rock property. As a result, this work on Balanced Rock has caused drainage problems along SR-9 in the Canyon Coffee shop area as well as Hummingbird Lane. On at least one occasion, muddy drainage from Balance Rock created dangerous conditions on SR-9 for bikers and potentially automobiles. As a result, the Town deployed resources to help clean up this mess.

When I look at the parking lot property (S-138-A-2) now, it appears to contain a number of rock walls and possibly altered concrete walls that did not exist when the 50 space parking lot was permitted and built in 2016. As a layman, I'm concerned the walls could just become part of the landslide should the slide occur again. I am also concerned that a portion of the toe of the landslide has been removed and may increase the chance of failure. For these reasons, I believe a proper geologic study needs to be done to confirm if the integrity of the parcel has been altered to the point where the parcel has become a danger to our visitors.

Also, due to the location of the parking lot, a major landslide at [50 Zion Park Blvd](#) could cause danger to SR-9 and a potential closure of this main artery to Zion NP, like happened in 1992. The outcome of full closure to SR-9 was discussed with Utah Geologic Survey staff a month or so ago. While they consider total failure to be unlikely, they indicated this can be an outcome when the toe of a landslide is compromised.

S-138-A-2 - Parcel History

In 2016, a prior owner of this 2.8 acre parking lot parcel at [50 Zion Park Blvd](#) applied for permission to put in a 50 space parking lot on the subject property. At that time, the Town provided significant evaluation on the property.

It was determined in 2016 that the property was primarily of steep slopes, in excess of 30% grades. As you know the Town's ordinances do not allow construction on property with grades of 30% or higher. In addition to the steep slopes, most of the property is within the Springdale Landslide. The Springdale Landslide is an active landslide. In fact, a sizable portion of this parcel experienced mass movement back in 1992 as a part of the large failure of the Springdale Landslide that caused the destruction of several homes and the closure of SR-9 for some extended time. This made Zion NP inaccessible for this time period.

The Town also stated that the property has: "characteristics that make proposed development difficult: steep slopes, geologic instability, natural drainages." Also, at this time in 2016, the Town determined that only a small portion of the property is not located on steep slopes or the landslide area, limiting the development of this property to a very small area (17,000 sq ft)..

Slope Maps for [50 Zion Park Blvd](#):

There have been two slope maps produced for [50 Zion Park Blvd](#) in the last 10 years. One map was produced by Professional Surveyor, Mark A Schraudt in 2016. The second map was produced by Jared Bates at Rosenberg last year (2025).

Note: The Bates grading report was provided in the Town agenda package, the Schraudt grading report from 2016 has been sent to the Town as Public Comment for this agenda item.

When comparing these two different slope maps, differences can be found in the area currently containing the expanded parking. The older map from 2016 shows a fairly significant 30% slope area in the space that Luke has used to expand parking and provide a public lounge. Again, this 30% slope area is an area where the Town does not allow development.

The second map from 2026, shows an absence of 30% or greater slopes in this same expanded parking lot area.

I know both Mr Bates and Mr Schraudt well enough to know that they both do very good work. In my mind, I don't question the work of either professional (Bates or Schraudt). Based on the grading changes to the property it appears that the work that Luke did without permits could be responsible for the changes in the grading of the land. This is a plausible explanation for the differences in the grading reports as produced by Schraudt and Bates.

Let's not forget the property is within an active landslide. And this area is within the highest rated (red) landslide as mapped by the Utah Geologic Survey.

Total Developable Area - S-138-A-2

The Town estimated in 2016 that there was approximately 17,000 sq ft of developable area that is not located on steep slopes or landslide area. In 2016, the parking lot was constructed with 50 authorized parking spaces and was ultimately built on about 15,000 sq ft. In contrast, the current expanded parking lot (Luke Wilson) contains somewhere between 25,000 to 27,000 sq ft. and 60+ spaces. By area, this is over 50% larger than the 17,000 sq ft total available developable area, as estimated by the Town in 2016.

Geologic Hazard Map - S-138-A-2

The Utah Geologic Survey maps (provided previously) show the proposed parking lot expansion is well within the highest hazard for landslide risk. Any review of this parcel should require a Geologic Study to clearly present the geologic hazards inherent in developing this land. If needed, this geologic study will recommend remediation to mitigate risk; to ensure this property is safe.

This hazard study should also provide a risk assessment for any anticipated structure(s) or on-site employees.

Where do we go from here?

There are many options for how the Town could deal with Luke's property.

First off, I believe the Town should require Luke to pay for an appropriate level of geologic review to determine the safety of the parcel and to evaluate if construction activity on this parcel has compromised the integrity of the landslide. Using LiDAR, Drones and other advanced mapping tools a study could make a better estimation of the location of the landslide. This should allow a review of the toe of the landslide; the hydrology of the parcel including the concrete walls and help to evaluate the safety of the onsite stacked rock walls.

Should this geo study find deficiencies, I believe Luke should be required to take action to restore the safety of the property.

One potential outcome, from this 8/19 meeting, would be to table Luke's DDR application until this geologic work can be completed. And to make sure the additional parking spaces that have been created are blocked off and not used until this study is complete and approval is given. Once this geologic study is available, a more informed decision can be made.

Future Penalties for Unauthorized Work?

I'm only aware of a few instances where contractors in Town have done work without appropriate approvals. In each case, the contractors were given the needed permits and sometimes issued fines. Many other communities have a more robust and varied response when this type of activity takes place. Perhaps we should consider more response options to these types of infractions; especially when a contractor is a repeat offender.

Some Additional Enforcement Options:

- * Stop Work Orders and Daily Fines
- * Required Deconstruction as a prerequisite before a permit may be obtained
- * License Suspension and Revocation
- * Denial of Future Permits
- * Court Actions - fines, voided insurance, etc