

8-3A-3 ALLOWED USES

A. Table 8-3A-1 of this section lists allowed uses in overlay zones.

....

	NCN	TOD	GBC
Temporary Use*	P		
Tobacco entertainment facility*	C		
Tobacco retail	P		
Urban Storage*	C	C	C
Vehicle Sales and Rental*	C		
Vehicle Service*	C		

....

...

TOBACCO ENTERTAINMENT FACILITY:

The use of a site primarily for the distribution or sales of tobacco products or products used for the consumption of tobacco primarily on site.

TOBACCO RETAIL STORE:

The use of a site primarily for the distribution or sales of tobacco products or products used for the consumption of tobacco primarily off site. Seating is limited to no more than four (4) patrons.

URBAN STORAGE:

A multi-story structure or group of structures containing individual, compartmentalized, climate-controlled units that are leased or sold to store material (including, but not limited to, goods, wares, merchandise, or vehicles), with a monitored electronic access control system and internal security camera system, and with no outdoor storage component. Commonly referred to in the self-storage industry as ‘Class A.’”

VEHICLE RENTAL:

The use of a site for car share or rental of motor vehicles for short periods of time, generally ranging from a few hours to a few weeks.

VEHICLE SALES:

The use of a site for the sale or long-term lease (terms of lease for more than a month) of new or used motor vehicles, including consignment sales and lease, and incidental repairs in preparation for on-premises display and sale.

...

New Title 8, Chapter 2C, Section 50

8-2C-50 URBAN STORAGE

A. Applicability: The requirements of this section shall apply to the placement of each new Urban Storage facility as defined herein.

B. Location Standards:

1. An Urban Storage facility shall not be permitted within one thousand feet (1,000') of any other existing Urban Storage facility. The required separation distance shall be measured as a straight-line radius from the nearest property line of the proposed facility to the nearest property line of any existing facility of the same use type, as established by a certificate of occupancy on record with the City.

C. Building and Site Design:

1. Ground floor activation shall be required and can be achieved through pedestrian a activation on all front, street-facing, facades. Site plans shall identify the primary access and front, street-facing façade for purposes of required activation. All ground floor building area along any public street-facing façade shall be occupied by active non-storage uses, including but not limited to retail, office, personal service, or a leasing/management office and shall consist of a 15-foot minimum usable depth for such commercial space. Storage units shall not be located on the ground floor of any public street-facing façade. Ground floor façade design and transparency requirements shall comply with the nonresidential design standards of § 8-4C-3 and 8-4C-4 of this title.
2. The facility shall include a monitored electronic access control system and an internal security camera system covering all individual storage unit access points, corridors, ground floor building entrances, and surface parking areas. All systems shall be maintained in operational condition at all times.
3. Safe pedestrian and vehicle access and circulation on the site and between adjacent properties shall be required.
4. The distance between structures shall be a minimum of twenty five feet (25').
5. Shall be a minimum of three (3) stories in height.

D. Parking and Access:

1. The entrance and exit drives shall be designed to prevent traffic hazards and nuisances.

2. All surfaces used for parking shall be constructed with paving, vegetative cover or of dustless material.
3. A dedicated loading area for moving trucks and trailers shall be provided at building entrances providing access to interior storage corridors, separated from pedestrian circulation routes and sized to accommodate standard moving trucks without obstructing public rights-of-way, drive aisles, or required parking.

E. NCN, TOD, and GBC Specific Standards:

1. For Urban Storage located in a NCN, ground floor activation shall meet a higher percentage-of-frontage threshold than the base standard, given the NCN's stated purpose of creating a "focal point of vibrancy and activity."
2. For Urban Storage located in the NCN, TOD, or GBC, tenant selection for the activated space shall prioritize uses that complement the zoning district and overlay rather than uses that are simply a natural fit with self-storage — for example, office (a small co-working space), personal service, health club (a boutique fitness studio or vertical commercial gym), eating establishment, limited and full service (a grab-and-go café or restaurant), or food store (a small-format urban grocery).
3. When located in a TOD, Urban Storage shall dedicate a minimum percentage of total building square footage, not just ground floor square footage, to non-storage uses such as those identified above, consistent with the TOD designation's mixed-use intent; a rooftop amenity such as a banquet or event facility with rooftop dining would not itself satisfy the ground floor activation requirement, but its square footage could count toward this building-wide mixed-use percentage in addition to whatever non-storage space is provided at the ground floor.
4. When located in a GBC, Urban Storage shall provide additional landscaping along the corridor-facing frontage beyond the base standard set forth in 8-4I, reflecting the Comprehensive Plan's vision for these corridors as "grand boulevards lined with trees".

F. Other Regulations Apply:

1. Design review consultant(s) recommendation to the planning official, and an approval by the planning official of the building design and site layout is required prior to a planning and zoning commission public hearing.
2. Urban Storage facilities shall not be used as dwellings.
3. Urban Storage shall not be used as a vehicle wrecking or junk yard as herein defined.

4. On site auctions of unclaimed items by the storage facility owners shall be allowed as a temporary use in accord with section 8-2C-38, Temporary Uses, of this article.
5. All outdoor storage of materials or vehicles shall be maintained in an orderly manner so as not to create a public nuisance.
6. Materials or vehicles shall not be stored within the required yard setback.
7. Stored items shall not block sidewalks or parking areas and may not impede vehicular or pedestrian traffic.
8. Urban Storage shall comply with Section 8-1C-3, Property Maintenance Standards, of this title.
9. If abutting a residential district, the facility hours of public operation shall be limited to six o'clock (6:00) A.M. to eleven o'clock (11:00) P.M.
10. If the use is unattended, the standards as set forth in Section 8-4A-6, Self-Service Uses, of this title shall also apply, or an on-site manager is present at all times.
11. Urban Storage shall be limited to operable recreational vehicles only. Recreational vehicle storage shall be approved only as an accessory use to a platted subdivision and/or approved planned unit development. Urban storage shall be limited to vehicles only and shall not include heavy equipment such as tractors or backhoes not normally needed for residential use.
12. Outside storage of materials for commercial or industrial uses shall be limited to those items owned or used by the business.
13. 4933-4949-0202, v. 10



Abigail R. Germaine

251 E. Front St., Ste. 300, Boise, ID 83702

T: (208) 343-5454 | E: arg@elamburke.com

www.elamburke.com

July 14, 2026

VIA EMAIL: building@gardencityidaho.org
hveal@gardencityidaho.org

City of Garden City, Development Services
c/o Hanna Veal – Associate Planner
6015 N. Glenwood St.
Garden City, Idaho 83714

Re: Code Text Amendment –Response to July 15, 2026, Staff Report and July 6, 2026,
Design Review Consultation

Dear Ms. Veal:

Thank you for providing your Staff Report related to CPAFY2026-0001 regarding our proposed Code Amendment to allow Urban Storage in the C-2, C-1, and LI zones. We have specifically reviewed and given attention to the items you addressed in Section B – Meeting Summary and Section J - Evaluation of Proposed Changes. The following provides our response to Design Review and your comments and potential solutions to the same. We appreciate the opportunity to revise this proposal and hopefully ensure it is the best version possible and will receive the support of Planning and Zoning and City Council.

Section B - Meeting Summary Comments:

Staff and Design Review Identified Issue: Ground Floor Activation – Minimum Depth. Consultants and Staff agreed on a 15-foot minimum usable depth recommendation for ground-floor commercial space along the required frontage; traffic should be struck from the phrase “pedestrian and traffic activation.”

Response/Solution: The minimum depth of 15 feet has been added to the Building and Site Design subsection of Section 50. Reference to “traffic” activation has been removed from this subsection as well.

Staff and Design Review Identified Issue: Maximum Lot Size and Three-Story Minimum.
Consultants questioned the three-acre maximum lot size and staff recommended that the three-story minimum be added as an affirmative design standard in Section 50.

Response/Solution: Maximum lot size has been deleted from Section 50. Three-story minimum has been added to Section 50 design standards.

Consultant Identified Issue: Remove 1,000-foot Facility Separation Radius.

Response/Solution: Would like to address this issue with the Planning and Zoning Commission as Applicant believes 1,000 ft separation radius would be appropriate and beneficial to encourage mixed use within a given area.

Staff Identified Issue:

- a. *Definition Revisions – Staff recommended that the definition be limited to distinguishing use characteristics, with design and operational standards addressed in Section 50.*
 - a. Resolved and revised.**
- b. *Removal of 8-2C-50(B)(1) as redundant.*
 - a. Resolved and Revised.**
- c. *Cross-reference to 8-2C-37(C) and (F) rather than rested language.*
 - a. Not all standards of Section 37 are applicable. Most standards have been restated in Section 50, however the following standards from Section 37 would not be applicable:**
 - i. Section 37(A)(1) not applicable to Urban Storage – facility would be allowed adjacent to a residential district. This issue was discussed with staff and Planning and Zoning Commission.
 - ii. Section 37 (C)(1) – language has been added to Section 50 which states that the facility shall not be used as a dwelling, however the ground-floor activation requirement necessitates a portion of the ground-floor being used for commercial or industrial purposes.
 - iii. Section 37(D) & (E) – This had been included by reference. Revised to list each requirement separately.
 - iv. Section 37(F) (1) – The prohibition of manufacture or sale of items by tenant is not applicable given the requirement for commercial ground floor space.
 - v. Section 37(F)(3) – Originally the limited hours of operation had not been included due to the nature of self-service and commercial use, however this has been added as “public” would not exclude a tenant from accessing its unit after hours.

- vi. **Section 37(F)(4) – Added.**
- vii. **Section 37(G) & (H) – Added. Recreational vehicles are not contemplated but language has been added.**
- viii. **Section 37(I) – Added. Urban Storage does not contemplate outside storage, but added for clarification.**
- d. *Design Review Requirement Mandatory.*
 - a. **Added to Section(D)(1)**
- e. *Removal of Urban Storage from the NCN and TOD overlays.*
 - a. **Further discussion needed. Applicant’s understanding is that their proposed project location is not within the NCN or TOD overlays, but is located within an activity node. Clarification is needed as to what the overlay table should indicate to ensure the proposed project is allowable in the activity node. Clarification is needed for what Staff desires to see as specific overlay criteria and where they wish this language to housed. Added language to Section 50 related to specific standards for Urban Storage in nodes.**

Section J - Evaluation of Proposed Changes Comments:

Staff Issue: Section 8-2C-50(B)(1) restates that Urban Storage is allowed in C-2, C-1, and LI. That is already shown by the columns in Table 8-2B-1. Repeating it here means two places to update if the eligible zones ever change. Staff suggests removing 8-2C-50(B)(1).

Resolved. Removed reference from 8-2C-50(B)(1).

Staff Issue: Staff disagrees with limiting the cross-reference to Section 8-2C-37(D) alone. Section 8-2C-37(F) contains standards that apply to the broader self-service storage use family, not just to design or site-layout choices.

See comment above related to references to 8-2C-37 as appropriate. See revised Section 50 for added language.

Staff Issue: The security and lighting fixes were both made as suggested. The applicant also switched the use’s name from “Storage Facility, Self-Service, Class A” to “Urban Storage,” which the Commission discussed favorably on April 15. But the definition in 8-7A-1 still mixes use and design: it requires a three-story minimum and says the use must “prioritize high design standards, pedestrian activation and engagement on the ground floor.” Those are design standards, not use characteristics, and they belong in 8-2C-50 instead, where they can be written with real, measurable detail. At the same time, the definition still needs to tell Urban Storage apart from a regular self-service storage facility, or an applicant could argue a project meets the “Storage Facility” definition and skip the Urban Storage standards altogether.

Resolved. Adopted Staff suggested definition. See revised 8-7A-1.

Staff Issue: The one-mile radius is now a 1,000-foot separation, measured from property line to property line and tied to a certificate of occupancy. This fixes the measurement problem staff raised above. Whether 1,000 feet is the right distance is a policy call for the Commission and Council.

Applicant to discuss 1,000 ft radius limitation with Planning and Zoning Commission.

Staff issue: Section 8-2C-50 also says all Urban Storage projects go through Design Review. But not every Urban Storage CUP will need it. A project that only retrofits the inside of an existing building, with no outside changes, would not trigger Design Review under the City's current process. If the applicant wants Design Review every time regardless of scope, that needs its own clear rule, similar to how Drive-Through Establishments are handled in 8-2C-13(B)(11). Staff asks the applicant to clarify intent: if Design Review should always apply, write that in directly; if not, this line should be removed as unnecessary.

Resolved. Added to Section(D)1).

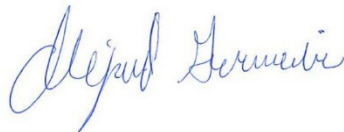
Staff Issue: Overlays Issue.

Further discussion is needed as to whether the overlays table needs to include Urban Storage. The suggested language adding specific standards for when Urban Storage is proposed within an overlay has been added to Section 50. However, without adding Urban Storage as a conditional use in the overlay table it would be prohibited.

Please let us know if you have any questions or if there is additional information we can provide to assist with processing this code text amendment.

Sincerely,

ELAM & BURKE
Attorneys at Law



Abigail R. Germaine