

September 19, 2026

Honorable Mayor Bill Jacobs  
Council President James Page  
Members of the Garden City Council  
City of Garden City  
6015 Glenwood Street  
Garden City, Idaho 83714

*Via email:* [planning@gardencityidaho.org](mailto:planning@gardencityidaho.org)

Also: Development Services Department, 6015 Glenwood Street, Garden City, ID 83714

**Re:** Draft 6 ORD 1071 26 SAPD 02 09282026 — Heron Commons Specific Area Plan District

**Subject:** Thermal evaluation, dig-once communications conduit, and streetscape pole integration in the Regulatory Master Plan

Mayor Jacobs, President Page, and Members of the Council:

Please accept this written comment on file **SAPFY2026-0001**. I ask that the Regulatory Master Plan treat first-phase civil work as a coordinated infrastructure moment: evaluate a shared ground-source or Thermal Energy Network (TEN); install spare communications conduit so more than one provider can serve the district; and design street poles so lighting, small wireless equipment, and related fixtures are planned with the buildings rather than added later as clutter. This comment does *not* ask the City to mandate geothermal construction, select a broadband service provider, prohibit natural gas for commercial process loads, or reopen the Adams Street mobility debate.

#### **Requested Action**

Amend the Heron Commons SAP so the Regulatory Master Plan (1) evaluates a district thermal / ground-source system timed with Phase 1 grading and flood work and reserves thermal corridors if feasible; and (2) requires spare multi-provider communications conduit and a pole / small-wireless integration plan for new streets, the pedestrian spine, and on-site easements.

#### **What the City and future occupants gain**

The SAP covers about 34 acres along the Boise River, including the former Ada County Highway District Adams Street yard and surrounding private parcels. The point of acting now is not novelty. It would mean a lower lifetime cost, a cleaner public realm, and fewer disruptions for the people who will live and work at Heron Commons.

1. **Lower and more stable utility bills.** Housing, shops, offices, and restaurants heat and cool on different schedules. A shared ground-source loop can move that surplus around the site instead of throwing it away. Ground-source heat pumps typically operate at a coefficient of performance of about 3 to 5—three to five units of heat moved for each unit of electricity—and they keep that performance through Treasure Valley inversions that force ordinary heat pumps onto expensive backup resistance. Occupants are insulated from natural-gas price swings for space conditioning, while gas can still serve kitchens and other process loads. Indoor equipment lasts longer than rooftop units; the ground loop itself is commonly designed for 50 years or more, which avoids two full replacement cycles of boilers and RTUs over a generation.
2. **A riverfront that looks like a place, not a mechanical yard.** Conventional HVAC consumes rooftops and creates condenser pads, flues, wall louvers, and meter banks along sidewalks. Clearing that equipment frees roofs for dining, green roofs, or solar, and keeps the pedestrian spine and Greenbelt edge quieter. The same logic applies above grade: if small wireless nodes, lighting, and cabinets are designed into one pole family, the district does not collect a second generation of clutter five years after opening. That is the aesthetic the SAP already claims—walkable, river-facing, finished.

3. **Cheaper construction because the ground is already open.** Loops, spare conduit, vaults, and pole foundations cost a fraction of a later retrofit. ACHD limits cuts in new pavement; every later provider or thermal extension would otherwise tear up streets the City just required. Dig-once conduit is the difference between undergrounding one company's cable and leaving extra ducts so a second or third provider can reach each block. Competition, not a monopoly drop, is what actually lowers internet prices and gives restaurants and residents a choice.
4. **Less disruption for the people who will live here.** A coordinated first-phase package means fewer future outages, fewer construction fences on the spine, and a street that still looks complete a decade after the first building opens. That is a municipal interest: fewer complaints, fewer permit fights, and a district that holds its value.

This is not a request to plug Heron Commons into downtown Boise's hydrothermal utility. That system uses naturally hot fault water near 170–177°F and does not serve this site. What is in view here is a *ground-source* network—stable earth temperatures of about 50–55°F and heat pumps in the buildings. Boise's district system is useful only as proof that shared thermal infrastructure can work in this valley when it is planned with the streets.

### Constraints the studies must take seriously

The Adams Street yard lies in the Boise River floodplain. Flood-protection earthwork and FEMA documentation are already proposed as required improvements. Any borefield, vault, conduit bank, or handhole must be coordinated with that grading, with groundwater and buoyancy, and with environmental screening of the former maintenance-yard use before test bores. The district also has multiple owners and will be built in phases. A shared thermal loop or an open conduit bank works only if the Regulatory Master Plan says who owns the asset, who may occupy it, how an early parcel connects to a later one, and which easements appear on the first plat.

Where improvements fall in ACHD right-of-way, the City can require coordination and a requested conduit section; it cannot write ACHD's cut policy. On private streets, the pedestrian spine, and on-site utility easements, the SAP can require the work directly.

### What this comment does not request

- A mandate to build geothermal, or a ban on conventional HVAC or on natural gas for restaurant and other process loads.
- A named internet provider, fiber count, drilling vendor, or unproven cost-reduction claim.
- A prohibition on small wireless facilities. Federal law and existing City small-cell rules already frame that use. The request is concealment and placement, not a ban.
- A position on whether Adams Street carries general traffic. That is a separate mobility question and should stay on its own record.

### Proposed ordinance language

The following clauses are offered for the Regulatory Master Plan / infrastructure provisions of SAP-02.

**A. Infrastructure Strategy — Thermal Master Planning.** *The Regulatory Master Plan shall include a feasibility evaluation of a shared ground-source or Thermal Energy Network serving all or part of the Heron Commons SAP District. The evaluation shall be coordinated with Phase 1 site grading, flood-protection earthwork, and utility layout so that any recommended borefield, vaults, and thermal distribution corridors can be constructed or reserved before vertical development. The study shall address load diversity across mixed-use parcels and phases; capital cost compared with conventional HVAC, including avoided rooftop and yard equipment; long-term operating cost; floodplain, groundwater; and environmental constraints; electrical service and natural-gas process-load needs; ownership, easements, phasing, and operations; and public-realm benefits from reduced mechanical equipment. If the evaluation finds a shared system feasible for all or part of the district, the Regulatory Master Plan shall identify reserved easements or corridors. Nothing in this section requires construction of a Thermal Energy Network or prohibits natural gas for commercial process loads.*

***B. Communications Infrastructure — Dig Once and Pole Integration.*** *The Regulatory Master Plan shall include a coordinated communications plan. New streets, the pedestrian spine, and required utility easements shall include spare communications conduit, with access points located to serve later phases and more than one provider, installed with Phase 1 grading and street construction. Access shall be offered on nondiscriminatory terms so occupants are not limited to a single communications provider. Where work falls in Ada County Highway District right-of-way, the applicant shall coordinate the same approach with ACHD. Small wireless facilities anticipated to serve the district shall be shown conceptually in the Regulatory Master Plan and designed as part of street lighting, signs, canopies, or building architecture. New freestanding monopoles shall not be used along the Greenbelt, pedestrian spine, or required public open space. Associated cabinets and power shall be screened to the same standard as other site utilities. Facilities shall comply with Garden City Code, including small-cell licensing and design standards, and with applicable federal law.*

## Suggested study questions

If the City prefers scope in the Regulatory Master Plan rather than in every line of code, the studies should answer:

- (a) Closed-loop, open-loop, or hybrid thermal, given river-adjacent alluvium, groundwater, and floodplain rules.
- (b) Whether streets, parking, or required open space can host loops without reducing public park area.
- (c) Whether a thermal network remains viable if only the ACHD parcel develops first.
- (d) Idaho Power capacity for electrified space conditioning, and spare conduit routing that does not conflict with water, sewer, thermal mains, or flood facilities.
- (e) Ownership and occupancy rules for spare conduit so more than one provider can serve each block.
- (f) A pole family for the spine and streets that can accept lighting, small wireless equipment, and wayfinding without a second generation of cabinets or monopoles.

## Conclusion

Heron Commons will be judged by how it meets the river, how it walks, what it costs to occupy, and whether the street still looks finished ten years after the first building opens. Garden City already intends to ensure there is master-plan flood protection, open space, and utilities before a buyer sets the pattern. Thermal mains, spare conduit, and designed poles are part of that pattern. Requiring a serious look—and the cheap sleeves and pole details—while the ground is open preserves options the Garden City cannot recover later.

Requiring construction of a thermal network before that look is finished would be premature. The middle path is the right one: study the thermal system, install spare conduit and integrated poles with the first streets, reserve corridors where the numbers work, and leave vendor choice to competition and evidence.

Thank you for the work already invested in this Specific Area Plan and for considering this addition to the official record.

Respectfully submitted,

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Garden City

*cc: Garden City Planning and Zoning Commission; Development Services Department  
Please include this letter in the official record for Draft 6 ORD 1071 26 SAPD 02 09282026.*