



Abigail R. Germaine

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

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

www.elamburke.com

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

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

Re: Code Text Amendment – Additional Information in Support of Code Amendment

Dear City Council Members:

Thank you for your attention to this matter. We would like to take the opportunity to provide some supplemental information in response to the Planning and Zoning Commission's ("Commission") recommendation from August 19, 2026, and City Staff's memorandum related to CPAFY2026-0001 regarding our proposed Code Amendment to allow Urban Storage in the C-2, C-1, and LI zones. We believe this information will help assure the City Council that the proposed Code Amendment is appropriate and desirable.

The Applicant and Staff have worked diligently to ensure the language of the Code Amendment is well written, thorough, and comprehensive. The Commission was complementary of the hard work and revisions that had been made throughout the process to guarantee the Code Amendment text was well written. The Commission's outstanding question on this Code Amendment focused on whether Urban Storage is appropriate in an area designated for active, pedestrian-oriented, destination uses. We believe the requirements of the proposed code, the high-design nature of the facility, the featured amenities, and the discretion available in approving said use through a conditional use permit, illustrates that Urban Storage is an ideal use within certain areas of the C-2, C-1, and LI zones.

Related to compatibility with the Comprehensive Plan and the Future Land Use Designations, it is worth noting a few aspects that are likely to inform a determination of compatibility.

1. **Mix-Use Residential.** In areas designated Mixed-Use Residential, with the proposed use being commercial, it is common to see these types of development exceed residential height limitations by a one story. The Comprehensive Plan contemplates a two-story maximum in Mixed Use Residential. A three-story facility would be appropriate considering the nature of the commercial use, but to the extent the City Council feels a project should be limited to two-stories in the Mixed Use Residential future land use designations, this would be acceptable. We would recommend the City look at this on a site-by-site basis.
2. **Live-Work-Create District.** A future land use designation of Live-Work-Create, is supported by this type of project in several ways. First, the requirement that an Urban Storage project obtain a conditional use permit ensures that the specific project design and mixed-use are reviewed for compatibility with the surrounding neighborhood. Should the Planning Department and the Planning and Zoning Commission find that the specific site location is not suitable for an Urban Storage project, one will not be permitted. Furthermore, the mixed-use requirements ensure that the street frontages of these projects will house shops and offices that contribute to a creative economy and space for the arts and pedestrian oriented offerings.
3. **Main Street Corridor.** An Urban Storage project has the potential to greatly enhance pedestrian and commercial activities by providing for street frontage shops and spaces to encourage pedestrian engagement, for example coffee shops, art spaces, retail, etc. Commercial tenant spaces with storefront windows, independent sidewalk entrances, and regular business hours provide destinations for nearby residents, employees, and transit users. Their placement along the ground floor puts the most publicly active uses where they contribute most to the pedestrian experience.
4. **Activity Nodes.** Garden City defines activity nodes as centers containing a mix of uses, public spaces, compatible transitions, and nonmotorized connections. This supports development of Urban Storage in areas with surrounding housing, employment, services, and transit. Urban Storage contributes commercial destinations and neighborhood services to that larger mix.

Please also refer to the discussion below regarding specific use standards which ensure compatibility of Urban Storage with activity nodes.

5. **Transit-Orientation Development Nodes.** There has been mention that the Urban Storage is vehicle dependent, which is incorrect. The design is such that it encourages walkability to units from nearby residences and provides a convenient, centrally

located option to access regularly used items that cannot be housed permanently at one's residence or business. Nearby storage helps serve apartment residents, small retailers, professionals, and other businesses that have limited space for belongings, records, equipment, or inventory. Locating that service close to its users can support compact housing and smaller commercial premises. This is especially true with nearby housing, local business demand, and the anticipated customer service area.

Furthermore, the multi-story design accommodates a storage service within a smaller footprint than an equivalent single-story facility. That arrangement can preserve more ground-level space for commercial tenants, landscaping, pedestrian connections, and public amenities. Garden City's current Comprehensive Plan anticipates development of three or more stories in activity nodes, particularly around transit stations. A building of that scale can therefore advance the intended physical development pattern, provided its massing transitions appropriately to neighboring properties. Building height supports this argument, and of course again, requiring a conditional use permit for these projects will ensure site-by-site evaluation.

Related to ensuring pedestrian-oriented and active use at these facilities, and in order to help foster compatibility with the Comprehensive Plan, the Applicant worked closely with City Staff to include Comprehensive Plan designation-specific standards.

Proposed Section 8-20C-50(D) now establishes Comprehensive Plan Designation Specific Standards tied to the Future Land Use Map, including activating -use requirements in an Activity Node or Transit-Oriented Development Node, and corridor frontage landscaping along State Street, Chinden Boulevard, Glenwood Street, or Veterans Parkway. The following language has been agreed to by Staff and the Applicant and is proposed to ensure harmony with the Comprehensive Plan and alleviate prior concerns by the Planning and Zoning Commission related to compatibility.

D. Comprehensive Plan Designation Specific Standards:

Where an Urban Storage facility is located on property designated on the Comprehensive Plan Future Land Use Map as a Neighborhood Commercial Node, Transit Oriented Development, or Green Boulevard Corridor, the following standards apply in addition to subsections A through C of this section. Where a property carries more than one such designation, the standards for each apply cumulatively; where they overlap, the more restrictive standard controls.

1. **Activating Uses:** Where an Urban Storage facility is located within an Activity Node or a Transit Oriented Development Node, as those areas are established in § 8-2B-3E of this title, the non-storage ground floor space required by subsection B.1 shall be occupied by one or more active, pedestrian-oriented uses that are open to the general public and generate regular foot traffic, such as office, personal service, health club, eating or drinking establishment, food store, or retail. The activating use shall

complement the base zoning district and the purpose of the applicable Activity Node or Transit Oriented Development Node. A use that is accessory to or primarily serves the storage operation, including a leasing or management office, does not satisfy this requirement.

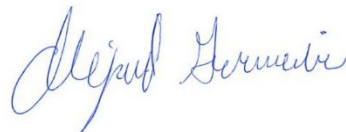
2. Building-Wide Mixed Use in a Transit Oriented Development Node: Where an Urban Storage facility is located within a Transit Oriented Development Node, as established in § 8-2B-3E of this title, non-storage uses, whether commercial or residential, shall occupy no less than ten percent (10%) of the total gross floor area of the building. Rooftop or upper-story uses may count toward this requirement but do not substitute for the ground floor activation required by subsection B.1.
3. Green Boulevard Corridor Frontage Landscaping: Where an Urban Storage facility is located on property designated as Green Boulevard Corridor on the Comprehensive Plan Future Land Use Map, trees shall be provided along every frontage abutting the corridor at a minimum of one (1) tree per thirty (30) linear feet of corridor frontage, measured along the full length of the frontage, in addition to the base landscaping required by § 8-4I.

In summary, the proposal combines a useful neighborhood service with the commercial frontage and compact building form needed to strengthen the nodes. Its compatibility should be demonstrated through the amount and quality of occupied storefront space, safe pedestrian connections, well-managed loading, and its relationship to surrounding development. We believe these standards, in addition to the other requirements of the proposed Urban Storage code, ensure that a proposed project will be compatible with the Comprehensive Plan and provide a much-needed amenity in certain areas within Garden City.

We look forward to presenting this proposal to you on October 26th, 2026, and will be prepared to answer any questions the City Council may have.

Sincerely,

ELAM & BURKE
Attorneys at Law



Abigail R. Germaine