**From:** David V. Gray
**To:** Grp. City Council and City Web Site
**Subject:** Mullan Area Neighborhood Plan Comments
**Date:** Sunday, December 13, 2020 5:44:57 PM

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Hello City Council,

I have done a quick review of the Mullan Area Neighborhood Plan and I have attached some comments of what I feel should be made to stop future hardship and waste in future development.

1. TABLE 3-1: TRANSECT STANDARDS SUMMARY and other tables have requirements for minimum ceiling heights and building story limits. Ceiling height requirements have never worked in zoning; they mandate energy wasting and polluting buildings by demanding poor Architectural design. They limit the density of residential and commercial construction by ignoring projections below the ceiling such as soffits, ducts enclosures, beams, etc which would be the bottom of the ceiling measurement. Entire stories can be lost due to this waste, lowering density potential. "Stories" limits are irrelevant; the building height is what the public experiences. If you define the max height you will get buildings with the mass desired to fit the neighborhood.
2. T5 C. Building Form table has min. depth of interior rooms. What does this have to do with zoning? This promotes poor design and inefficiencies in development and should be removed.
3. Parking in general defines density. If you cannot park it, you cannot have it. Some of the tables have parking set back from the property line 30 feet. That is equal to 3 lost parking stalls per row. These developments would be better served by screening parking with a hedge or fence, not allowing parking in front of the front facade of the building or ten feet of the front property line whichever is less. This would allow a nice downtown or community atmosphere and less highway 93 aesthetic. To have well designed density that is affordable the land use for the building, parking and landscaping must be efficiently used. That is not currently planned into the final draft. The pictures show dense tight development but the regulations do not mirror the presentation pictures.
4. Parking placement should allow some of the parking on the side of the building so a front door is needed. If parking is only allowed behind buildings the front entrance will face the parking and not the street. A faux entrance may face the street but it will not provide the street vitality desired by planners.
5. The shared parking proposal is a good idea and will help lessen overall parking lot sizes.
6. DIVISION 5 STANDARDS FOR LOTS & BUILDINGS Glazing depictions. These are definitely not designed by a person familiar with buildings.
   The representative buildings will all fall over in the first subtle wind. There is far too much glass to provide an adequate lateral system for the 1st floor or comfortable interior space. If the Council wants only the most expensive building construction techniques used, so that the spaces are expensive to build, lease and own you are on the right path. The amount of glazing will also

contribute a great deal to the amount of pollution generated by the building as it will triple the heating and cooling loads of a normal building of the same size and scale. That amount of glass will also make the interiors spaces too hot or too cold for people to enjoy.

7. Delete all remarks concerning accessibility. Not because it isn't important but because it is already required by the ADA and ANSI 117.1 If the city doesn't want to be a part of every lawsuit just stay out of it. The developer or lawyer will just say the City Code made this violation required so they must share the blame and responsibility.

Overall I think what is desired by this proposal is a nice community but I think this document is going to really impact affordability of developments in this area. It is a quite an intrusive document that brings a level of hardship to development to a whole new level. I doubt the city staff has capacity to take it on in a reasonable amount of time. The additional time needed to move projects through the process is going to come with additional cost passed onto the customer. I think the effort was meaningful but the end product will not be what was intended. I recommend taking a step back and running a sample project through the process with a volunteer developer. It would help all parties know what works, what doesn't and how it could be streamlined. As this plan will lock up the majority of developable land for the foreseen future it needs to be done right upfront.

Respectfully,

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