

These are my personal comments on Title 21 Chapter 7 development standards, not necessarily those of ZBEA.  
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21.07.030.B.2 **Private open space** Eliminate private open space requirement for commercial projects. The cumulative effects of other new requirements along with this requirement get to a level that is above what I feel is reasonable. The open space requirement for residential is understandable because people live and should have yard space. Commercial projects can include open space as an amenity if they choose, but they should have the freedom to make that choice. Likewise, for mixed use development on base requirements on the residential component of the project.

21.07.080.D.6.d **Parking Lot Interior Landscaping** Keep parking lot minimum interior landscaping to 5% regardless of the parking count. Using 10% for parking lots with more than 40 spaces seems to be a large burden with no apparent reason. Be consistent for all parking lots with at least 20 spaces. The 5% ratio in existing title 21 has worked well and does not to be doubled.

21.07.090.I **Vehicle Stacking Areas** The number of required stacking spaces seem too large. I don't recall seeing any of these facilities with vehicle lines disrupting traffic flow in parking lots or in streets. If it's not broken, why fix it? This seems to go against the intent of the new regs to eliminate unnecessary parking above required amounts.

21.07.090.J **Implementation of ADA** Please check reference to ADA with Building Safety. I believe the codes adopted by MOA refer to ICC/ANSI A117.1-1998 instead of ADA.

21.07.100.F.3 **Building Layout** Minimum distance between buildings is regulated by the building codes in regards to fire safety. For structures for 4 or fewer stories, the 20', 30', and 40' minimum distances between structures are very large. Pedestrian courtyards can be attractive with more intimate scale. I favor decreasing all minimum distances by 10 feet.

21.07.100.F.5 **Roof Design** Limiting a continuous roofline to 50 feet is very restrictive and arbitrary. As an architect, I can envision many aesthetically unappealing solutions that would meet this requirement while a simpler form would be better. This a prime example of well-meaning regulation that will not achieve its desired objective. Eliminate the requirement.

21.07.110.E **Orientation Design Choices** 4.b.i minimum percentages for windows appears to be large and arbitrary. Windows are often a function of interior space functions, energy efficiency (much lower R-value than wall), and many other design factors. Decrease larger percentages by 10% and overall percentages by 5%.

21.07.110.E **Building Massing & Articulation** Delete in its entirety. All the choices are very restrictive to design and seem arbitrary. I can envision that some of the choices could have negative effects. It wholly places a burden on commercial lots adjacent to residential construction without any burdens on residential lots.

21.07.110.E **Facade Articulation Choices** The code makes an aesthetic judgement that a busy facade is better than a simple, elegant facade. The number of required design features in Table 21.07-13 is excessive and should be reduced to 0 for < 7000sf, 1 for between 7000 sf and 25000 sf, and 2 for more than 25000 sf. This a prime example of well-meaning regulation that will not achieve its desired objective.

21.07.110.E **Wind and Shadow Impacts** The wind study requirement is nonspecific in its goals and requirements. It will be costly and provide little benefit. Wind direction changes due to weather systems and there is no credible use for designing at street level for pedestrians. Wind studies are done for tall buildings where structural design parameters are of increased importance to ensure structural integrity. Wind studies on tall buildings have little to do with wind velocities at grade level. ***A total waste of time and money!*** Shadow studies in the title 21 draft have no performance requirements and are nonspecific in goals. The regulations will tend to produce shorter buildings when increased densities could be a better solution (especially in CBD).

21.07.120.E.4 **Community Space in Large Commercial Establishments** Commercial projects can include open space as an amenity if they choose, but they should have the freedom to make that choice. Space to allow for pickup/drop-off has much more value than plaza space.