



August 6, 2019

Dear Planning Board Members,

On behalf of the 700+ members of the Missoula Organization of REALTORS® we ask that you do not recommend adoption of the proposed amendments to the Townhome Exemption Development (TED) regulations. We disagree with the premise that current TED regulations have limited the City's "ability to adequately accommodate orderly development while protecting the public health, safety and welfare of the community". We are unaware of any approved TED projects that have jeopardized orderly development or public health, safety and welfare of the community.

MOR has been at the forefront of communicating the increasing challenges to Missoula's housing affordability with our 2018 Making Missoula Home study and the annual housing reports. Our information demonstrates an increasing demand for, and a decreasing supply of, homes in our market. At a time when policy makers should be working to promote increased residential development, these proposed rules will significantly limit an effective development tool, further exacerbating affordability problems.

TEDs have provided builders with the opportunity to lower development cost, reduce length of reviews and increase the supply of residential housing. Since the 2011 enactment of TED legislation, 461 residential units have been created by TEDs while at the same time only 55 units were created through subdivision. TED project larger than 10 units have also been key to significantly adding to the housing supply, representing 61% or 281 units created. Forcing projects over 10 units into the subdivision process will increase time, cost and have an immediate adverse impact to housing development.

If the city believes that it needs to further direct TED development, we would encourage them to utilize the zoning ordinances rather than subdivision as the avenue to better refine the approach. We should be looking for ways to increase housing stocks thereby reducing pressure on home prices created by the housing shortage in Missoula. After consideration of the significant negative impact to development of housing in Missoula we would ask that the board oppose recommending the adoption of these regulations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dwight Easton', with a stylized flourish at the end.

Dwight Easton
Public Affairs Director
Missoula Organization of REALTORS®