

From: [Eran Pehan](#)
To: [Benjamin Brewer](#)
Subject: Agency Comment
Date: Tuesday, September 17, 2019 3:11:32 PM

From: Eran Pehan <PehanE@ci.missoula.mt.us>
Sent: Monday, September 16, 2019 3:36 PM
To: Benjamin Brewer <BrewerB@ci.missoula.mt.us>
Subject: Agency Comment

Mr. Brewer,

The Office of Housing and Community Development would like to provide comment on the recommended changes to Staff's Proposal for Amendments to Title 20 Zoning Code related to Townhome Exemptions, that resulted from the August 20th Planning Board Meeting. The following comments highlight alignment between recommendations made and *A Place to Call Home*, the City of Missoula's recently adopted housing policy.

1. In Section 20.05-7, the Planning Board Recommends increasing the administrative review standards to 15 or fewer dwelling units in RT5.4, RT10, and all R districts (except R3) and to 30 or fewer dwelling units in RT2.7, R3 and all RM, B, C, and M1R districts. **The Office of Housing and Community Development supports the recommendation for cap bonus as adopted. Administrative review for smaller, simpler projects decreases unnecessary regulation and risk. This will result in an increase in housing supply and may impact housing affordability by decreasing construction time, and therefore construction cost.**
2. In Section 20.40.180.I.1, the Planning Board outlines an approach to allow for phasing, subject to review by the zoning officer and in consultation with the city engineer. **The Office of Housing and Community Development strongly supports the recommendation to allow phasing through approved phasing plans.** Projects of all size face financial constraints that are alleviated through phasing. A small scale developer proposing a TED with 10 dwelling units may only be able to initially finance the construction of five units. An approved phasing plan would allow that developer to finance the project in two distinct phases, decreasing the amount of capital they have to secure up front. Appropriate phasing may allow smaller local developers to "scale up" and tackle larger projects. This could have a beneficial impact on supply and increase the number of infill TEDs across the community.

Eran Fowler Pehan
Director
Office of Housing and Community Development
406-552-6395