

From: [Neil Miner](#)
To: [Anna M. Vickers](#)
Cc: [Dave DeGrandpre](#)
Subject: RE: Greenough Heights Subdivision and Rezoning First Agency Review
Date: Wednesday, January 12, 2022 5:01:50 PM

Hi Anna,

Thank you for the opportunity to review this project.

As the Parks Department has previously commented, we are open to accepting Cherry Gulch as public parkland, and an addition to Greenough park, as it meets 3-080.8.A:

8. Parks and open space types and standards: parks, open space, and common area dedication must meet at least one of the following criteria:

A. Provides for the preservation of a physical amenity such as a meadow, a stand of trees, significant wildlife habitat or a wildlife corridor, a scenic hillside with slopes less than 25%, a stream or other significant water body, a riparian resource area or some other natural feature that the City Council determines is significant enough for parkland dedication. Open space must be managed to remain in a near natural state when it has been dedicated for preservation or conservation purposes, and managed for noxious weeds and public safety concerns such as wildland fire and hazard trees. Public trail connections are permitted if deemed appropriate by the City Council;

As shown in the submitted grading plans, there is grading up to the open space parcel boundary. To meet the above parkland dedication, and to provide the preservation of Cherry Gulch as a physical amenity, no fill can be added to that parcel, nor can the trees/vegetation can be removed in that parcel without consultation with our Conservation Lands team. There may be some vegetation in the Gulch that our team may remove in the future, based on invasive nature in the natural environment (such as Norway Maple).

Below are additional comments from our department:

- Weed Management Plan.....there is no reference given to Russian olive. Thickets of Russian olive are present along the road and actively recruiting on the property. This is a listed noxious weed. Russian olive is far more impactful to riparian areas than houndstongue (the only weed they propose to control). All Russian olive should be eradicated from the site. Physically uprooting and disposing (at the dump or GC compost) of the trees and, or cutting the trees and doing a herbicide treatment (triclopyr or imazapyr) to the stumps should occur. Retreat as needed. Handpull new sprouts before they establish.

There is no reference given to Japanese knotweed. Japanese Knotweed is present along the foundation and under the deck of the existing yellow house which spans future lots 15& 16. This listed noxious weed is far more impactful than Houndstongue or Russian olive to riparian areas. This patch of Knotweed used to extend all the way to the commuter trail in Greenough park. Over the past 10 years Msla parks and the Msla Co. weed dist. have nearly eradicated knotweed in Greenough park. The existing infestation on lot 16 and 15 should be eradicated through excavation of the root crowns and, or treatment with imazapyr. As the

- majority of weed control on site will transfer to individual property owners.
- The Parks department supports the variance request for the Greenough Drive sidewalk across Cherry Gulch/open space as that would preserve more of the natural character of Cherry Gulch. As the Parks Department will likely be responsible for maintenance of this stretch of sidewalk adjacent to the open space, we would request to coordinate and review final design to ensure we are capable of maintaining with our equipment. Our review will also consider the wildlife movement through a major North Hills x Rattlesnake Creek wildlife corridor, mainly in regards to any retaining wall and handrail/guardrail.
 - Trees along Greenough Drive.....we see trees in the neighborhood but none along Greenough drive. Please add trees along Greenough Drive. Replacing the lost Ponderosa Pines would fit the aesthetics and require limited maintenance.
 - Deforestation due to grading.....There are some really large pines on the south and western boundaries. Will the proposed grading plan require clearcutting of all of these trees. Some of those trees are likely over 300 years old. They have significant value to the urban forest, Rattlesnake Ck. and future homeowners. Hopefully some can be retained.

Please let me know if you have any questions with the above.

Thank you,
Neil

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Cc: Dave DeGrandpre <DeGrandpreD@ci.missoula.mt.us>; Paul T. Forsting <Paul.T.Forsting@imegcorp.com>
Subject: Greenough Heights Subdivision and Rezoning First Agency Review

Dear Agent:

Missoula's Development Services has identified you as being an agency that may have important comments regarding the proposed major subdivision, Greenough Heights Subdivision. Your comments are important to us.

On December 22, 2021, Development Services posted the Greenough Heights Subdivision link online for you review. The purpose of this agency review is twofold: 1) For agencies to determine if the subdivision submittal packet has enough information or is sufficient for review; 2) For agencies to provide comments regarding the proposal on anything that should be addressed before the project is submitted for governing body review. Thus, it is important that you send us your comments or let us know if you have no comments.

You will have 12 working days from today, December 23, 2021, to review. Please reply and send any comments directly to anna.m.vickers@imegcorp.com, by end of the day, **January 12, 2022**, and copy DeGrandpreD@ci.missoula.mt.us. Thus ensuring that development services can complete their agency deadline review of January 18, 2021.

The link to the subdivision application for review is :
<https://www.ci.missoula.mt.us/2864/42724/Greenough-Heights-Subdivision-and-Rezone>

If there is anything we can do to facilitate your review, please reach out to us. Thank you in advance for your comments.

Anna M. Vickers
Land Use Planner



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