

From: [Eran Pehan](#)
To: [Emily Gluckin \(she/her\)](#); [Ashley Brittner Wells \(she/her\)](#)
Cc: [Benjamin Brewer](#)
Subject: FW: DeSmet Convoluted TIF taxation
Date: Wednesday, November 20, 2024 9:24:13 AM

For the record.

From: Matthew Driessen <mdriessen@desmetschool.org>
Sent: Wednesday, November 20, 2024 9:01 AM
To: Benjamin Brewer <BrewerB@ci.missoula.mt.us>; Eran Pehan <PehanE@ci.missoula.mt.us>; Heather <hburgad@desmetschool.org>; Synthia Wendell <swendell@desmetschool.org>
Subject: DeSmet Convoluted TIF taxation

You don't often get email from mdriessen@desmetschool.org. [Learn why this is important](#)

Thank you and your group for your hard work on this project,

To understand the big tax issue and how it will affect my business district is to wrap our minds around how TIF taxation effects school budgets.

A school will need an exact amount of money for its budget.

We get that money through several sources, one of which is Permissive levy.

When we ask for money through a permissive levy, a portion is diverted to the TIF district.

However, we still need the exact amount of funds, so the taxes increase to create the funding we need for our programs.

Example. \$10,000 required.

- half in the TIF, half outside the TIF (which is pretty much our district)
- If the school levies \$10,000, then...
- school receives \$5000. TIF receives \$5000
- School needs to tax \$20,000 to get their required funds, so
- then School receives \$10,000, TIF receives \$10,000

To offset this nightmare for our businesses, we need to increase the taxable value outside the TIF, but in our school district.

Mixed use in the area from Butler Creek to Grant Creek Village will increase the tax footprint, so the businesses will not be taxed so heavily.

Buildings inside the Tech District don't help, that money is diverted also.

Over time it will become a fivefold issue, snuffing out existing businesses through high taxation.

I hope this helps in the understanding, it is complex cost shifting between the city and county taxation and zoning policies

Thanks, Matt

--

Matthew Driessen Ed.S., Superintendent/ Principal DeSmet Public School

406-549-4994 Phone

406-549-6731 Fax

mdriessen@desmetschool.org

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Comment at

**Missoula Consolidated Planning Board/Planning Commission
Public Hearing:**

- **Tuesday, November 19, 2024, at 6:00 p.m.**
- **Sophie Moiese Room of the Missoula County
Courthouse, 200 W Broadway or online**

Good evening and thank you for the opportunity to comment. I am a resident of Missoula and an active member of the Missoula cycling community. I co-founded the Zootown Ebike Club as a mechanism to facilitate the bi-directional communication between the cycling community and land use planners. I offer these comments in that context.

I first want to acknowledge the work by City staff and the advisory boards in creating the **"Our Missoula Draft Land Use Plan"** I agree with the selected emphasis on urban infill as opposed to sprawl. I complement city staff and the leadership in the Bicycle Pedestrian Transportation office and the Our Missoula office. The draft Land Use Plan is a statement of principles and goals that must now be realized with revision of the Uniform Development Code. I am speaking in support of the Specific Implementation Actions (page 118 of the draft land use plan) and I look forward to the new code requirements that will achieve these plans; I am particularly interested in code revisions to implement two of the action items:

- Action # 26, "Through the Place Type Map and Zoning Map Update, increase housing opportunities in residential areas that have good access to services and amenities by walking, biking, and transit."
- Action #50, to "Develop street standards that prioritize safety, multi-modal level of service, and enhanced placemaking."

From a cyclists' perspective these implementation actions must include:

- More cycling infrastructure (wider bike paths, secure bike parking, and better street design - with protected bike lanes). I think about some personal examples that I hope will be addressed with revision of the UDC:
 - I have Friends who describes years of bike commuting to work along Reserve Street as "Combat cycling." It is reassuring to see that the city is planning for a major safety redesign. I hope that code revision will eliminate the need for 'combat cycling elsewhere in the city.
 - Most cyclists must ride while staying aware of driver frustration as they ride the "tightrope of a thin white line separating traffic from a crumbling road edge. Again, I hope that code revision will add cycling lanes to improve safety and designs that reduce traffic conflicts with cyclists.
- I understand that the goals of the Land Use Plan must be accomplished within the constraints of construction costs and budgets. However, in that environment we need to think of bikes and ebikes as part of the solution:
 - Bike commuting reduces car traffic and demand for car parking.
 - Bike paths and bike lanes should be treated the same as roads: they are not a good place to pile leaves or snow.
 - City expenditures on roads and parking can be offset with bike commuting and effective implementation of the Land Use Plan.

I am looking forward the future work to achieve the vision of the Land Use Plan in the revised uniform development code.

Thank you again for the opportunity to comment.

From: [Terri Roach](#)
To: [Benjamin Brewer](#)
Cc: [Andrea Stierle](#); [Jeani Alonzo-Adams](#); [Kathy Gaskil](#); [Judy Molland](#); [Kalina Pritchard \(she/her\)](#); [Melissa Glueckert \(she/her\)](#)
Subject: Land Use Planning
Date: Monday, November 25, 2024 11:21:20 AM

Ben,

The Upper Rattlesnake Neighborhood Council Leadership Team met on November 19 and discussed the proposed Land Use Plan for the City of Missoula. Our input would be that the city keep in mind possible emergency evacuation scenarios when considering housing density in Rattlesnake neighborhood. We only have two roads leading into and out of the Rattlesnake, and traffic can get clogged very quickly. When we hosted a general meeting of the Upper and Lower Rattlesnake Neighborhoods in April of this year, the Missoula County Office of Emergency Management provided some emergency evacuation scenarios. The scenarios indicated that it could take up to six hours to evacuate the entire Rattlesnake neighborhood. As you are aware, Butler Creek had a nighttime emergency evacuation in July, due to a wildfire. Therefore, we feel this is a potential risk situation for our neighborhood as well. We simply ask that this issue be given consideration when housing proposals are reviewed.

On behalf of the Upper Rattlesnake Neighborhood Council
Leadership Team,
Terri Roach, Co-Chair

Sent from my iPad

From: [Eran Pehan](#)
To: [Emily Gluckin \(she/her\)](#); [Ashley Brittner Wells \(she/her\)](#)
Cc: [Benjamin Brewer](#)
Subject: FW: Rattlesnake Statement
Date: Monday, November 25, 2024 12:27:59 PM

Can you please add this to the record?

From: Adriane Beck <abeck@missoulacounty.us>
Sent: Monday, November 25, 2024 11:18 AM
To: Eran Pehan <PehanE@ci.missoula.mt.us>
Subject: RE: Rattlesnake Statement

To whom it may concern,

In reviewing the City's new Land Use Plan and Place Type Map, the Office of Emergency Management (OEM) and other public safety agencies, recommend a lower density than is proposed in the Upper Rattlesnake due to the limited available egress routes and high wildfire risk. In the event of an emergency that required evacuation, having a large population at the top of this drainage would present significant issues both in moving individuals (out) to safety, but also in providing a robust response (in) of public safety equipment and personnel. OEM does not recommend planning for high density in an area with high wildfire risk and only one way in and out.

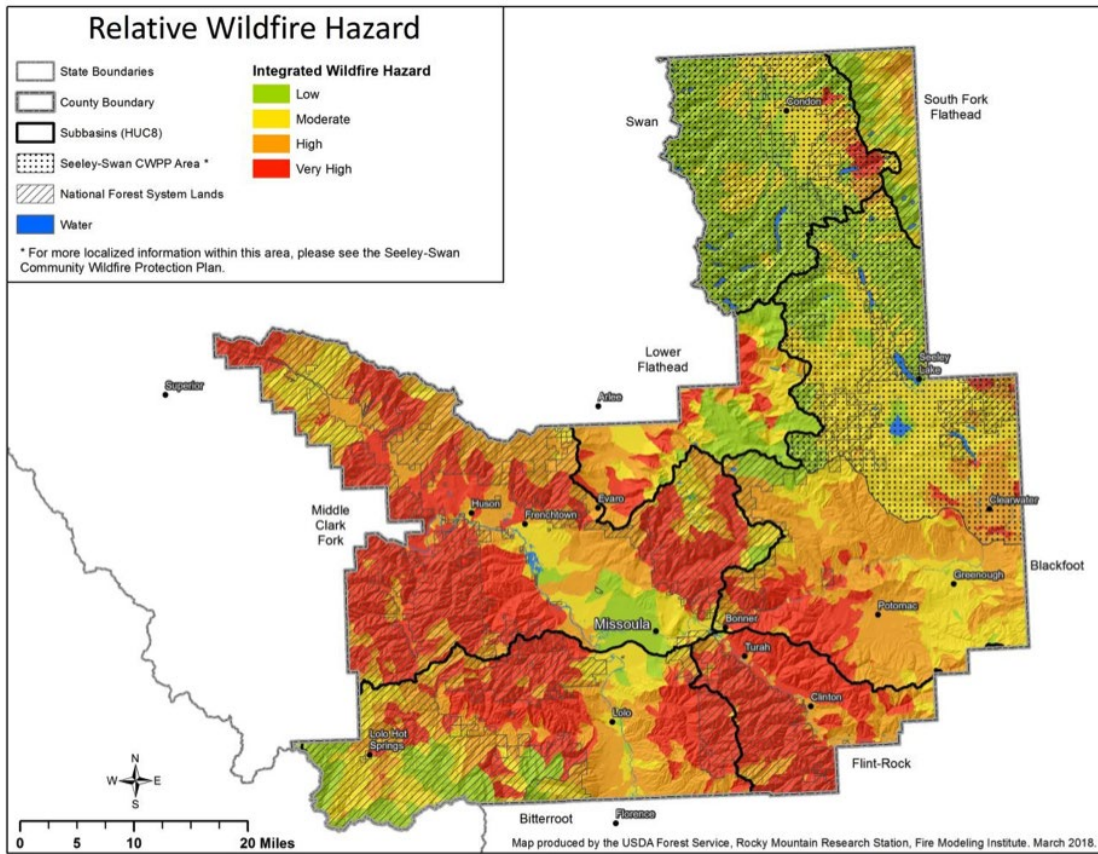
Adriane Beck
Director, DES Coordinator
Office of Emergency Management
Office 406-258-3632
Cell 406-830-0974
abeck@missoulacounty.us

From: [Benjamin Brewer](#)
To: [Ashley Brittner Wells \(she/her\)](#); [Emily Gluckin \(she/her\)](#)
Cc: [Eran Pehan](#)
Subject: FW: FW: Rattlesnake Statement
Date: Monday, November 25, 2024 3:52:32 PM
Attachments: [image001.png](#)
[Screenshot 2024-11-25 at 3.05.09PM.png](#)
[Novemberdraft.png](#)
[Screenshot 2024-11-25 at 3.14.22PM.png](#)

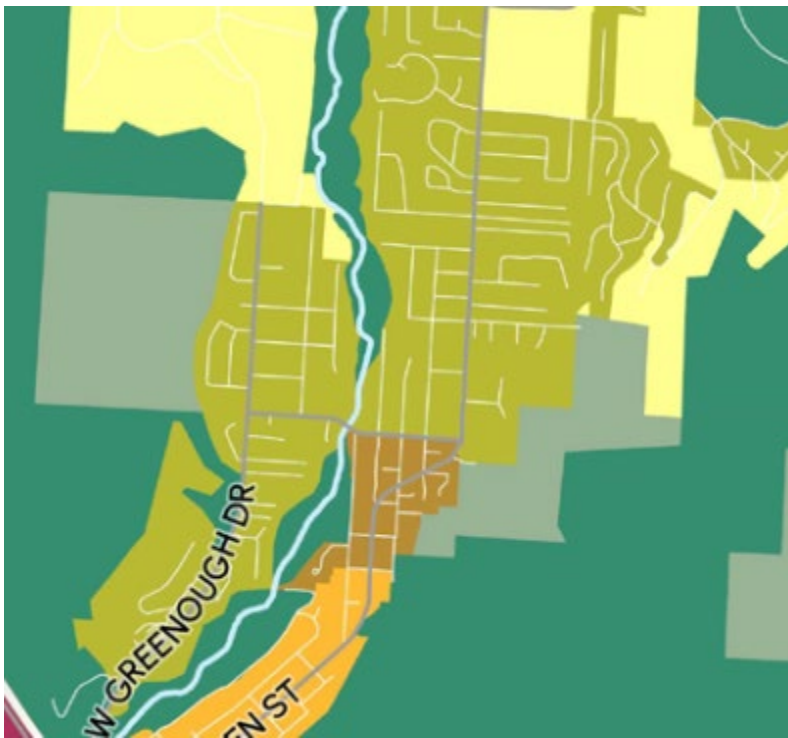
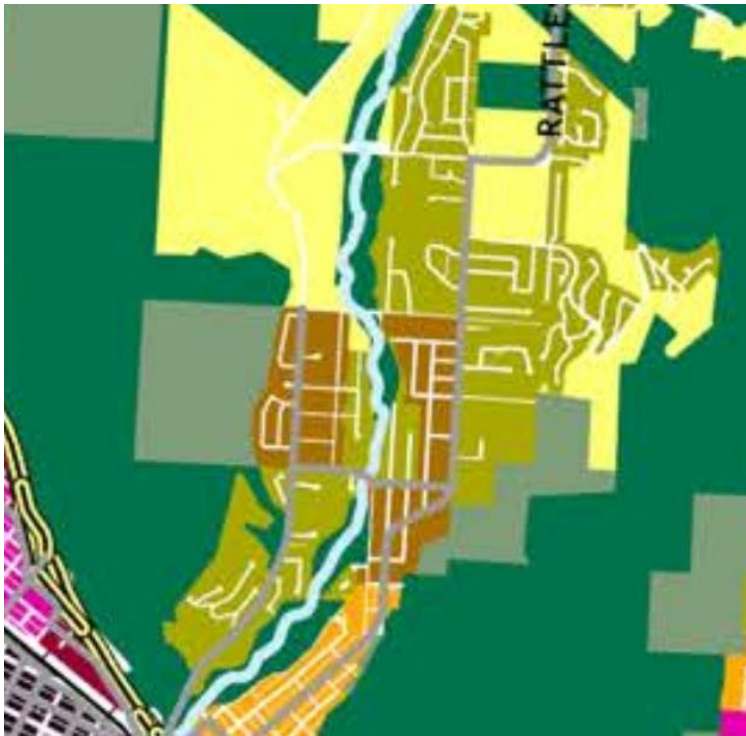
Hi Emily, can we add this in to the record too, thanks! -Ben

From: Danny Tenenbaum <drtenenbaum@gmail.com>
Sent: Monday, November 25, 2024 3:20 PM
To: Benjamin Brewer <BrewerB@ci.missoula.mt.us>; Eran Pehan <PehanE@ci.missoula.mt.us>; Adriane Beck <abeck@missoulacounty.us>
Cc: Mike Nugent <mikenugentmsla@gmail.com>; Jennifer Savage <savagemama4@gmail.com>; Sandra Vasecka <sdvasecka@gmail.com>; Daniel Carlino <carlinoformissoula@gmail.com>
Subject: Fwd: FW: Rattlesnake Statement

Thank you for getting this response from OEM. I absolutely agree with the principle that "OEM does not recommend planning for high density in an area with high wildfire risk and only one way in and out." The areas in the Middle Rattlesnake that saw a reduction in density in the Final Draft, however, have two collector streets for egress (Van Buren and Greenough Dr.) and are designated as 'Moderate' wildfire risk in OEM's 2018 Community Wildfire Protection Plan:

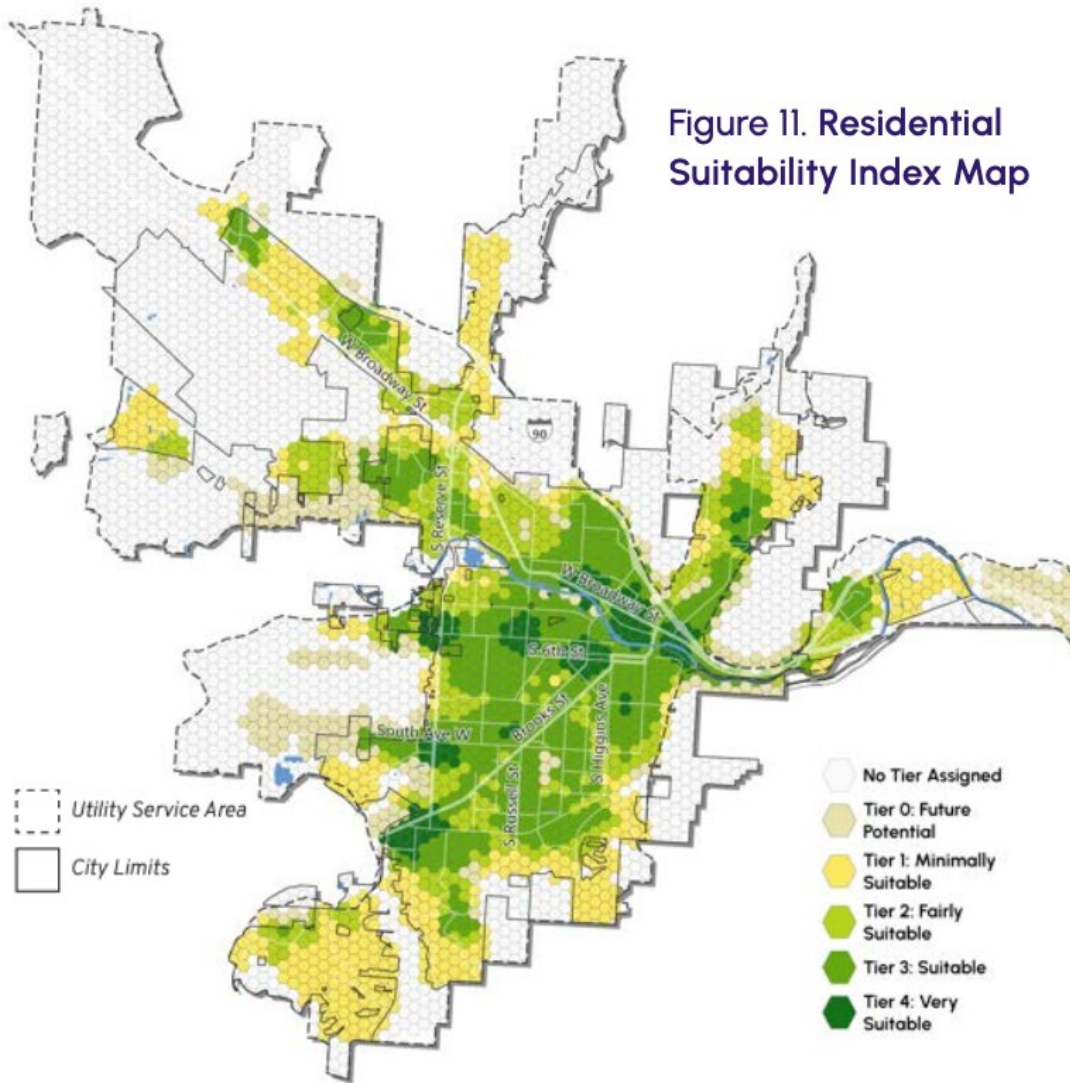


Furthermore, the areas in question were never designated 'high density'. They were changed from 'Urban Residential Low' (max 6 units/parcel) to 'Residential Limited' (max 4 units/parcel):



These particular areas of the Rattlesnake were identified by City staff as having the highest suitability ranking for new housing, higher than most of the Lower Rattlesnake, U District, F2F, Riverfront neighborhoods (all of which are designated for 'high density'):

Figure 11. Residential Suitability Index Map



Based on CPDI and OEM's criteria, these neighborhoods in the Middle Rattlesnake should receive a higher density place type than has been assigned in the current draft land use plan. I hope this change is made prior to the adoption of the final draft by City Council next month.

Thank you,

Danny Tenenbaum
406-285-1460

----- Forwarded message -----

From: **Analeshia Rodriguez** <arodriguez@missoulacounty.us>

Date: Mon, Nov 25, 2024 at 2:35 PM

Subject: FW: Rattlesnake Statement

From: [Bob Giordano](#)
To: [Benjamin Brewer](#); [Eran Pehan](#); [Andrea Davis](#); [Laval Means \(she/her\)](#); [Emily Gluckin \(she/her\)](#); [Ashley Brittner Wells \(she/her\)](#); [Ben Weiss](#); [Aaron Wilson](#); [Samantha Suter](#); [Jennifer Savage \(she/her\)](#); [Eric Melson](#); [Neighborhood Council - Lower Rattlesnake](#); [Neighborhood Council - Upper Rattlesnake](#)
Subject: submitting the Rattlesnake Transportation Plan, as a public comment for Our Missoula
Date: Friday, November 29, 2024 3:18:37 PM

Hi Ben Brewer, all,

For this email, I am representing the Rattlesnake Transportation Committee.

A few years ago, we spent 2 years making a Rattlesnake Transportation Plan, with many dozens of committee members and many hundreds of public comments.

The committee, at our last meeting, asked me to submit the plan to you all, as public comment and as part of the input process.

It is a big plan, yet there are many good and specific proposals in the plan.

Rather than copy the whole thing, I am sending you the link. Please peruse the plan as you can, and utilize all of our work in order to help inform the Our Missoula process.

Here is the link:
<https://rattlesnaketransportation.org/>


Let me know if there is more I can do; Thank you very much,

Bob Giordano, chair, Rattlesnake Transportation Committee

From: [John Oetinger](#)
To: [Ashley Brittner Wells \(she/her\)](#); [Emily Gluckin \(she/her\)](#); [Benjamin Brewer](#)
Subject: Our Missoula 2045 plan feedback
Date: Monday, December 2, 2024 11:37:17 AM
Attachments: [image001.png](#)

Some people who received this message don't often get email from johnoetinger@outlook.com. [Learn why this is important](#)

I tried submitting comments at [Our Missoula 2045 Land Use Plan | Engage Missoula](#) on 11/26 and again this morning and am getting the following error. I tried with Edge and Chrome. I am logged in.

 https://www.engagemissoula.com/growth-policy-update/guest_book/comments



This page isn't working right now

www.engagemissoula.com can't currently handle this request.

HTTP ERROR 500

Here's my comments:

I read the Missoulian article Nov 21, 2024 about Our Missoula 2045 plan, and it made me wonder how annexation is factoring into the plan, so I read the portions of the draft plan focusing on annexation. On pg20, the map mostly makes sense, although it seems the areas north of 3rd and west of Reserve, and south of Mullan, ought to be included in Plan A. I realize a large majority of Target Range are fiercely opposed to annexation, but really, it seems like it also ought to be in A. I don't live in those areas, and don't know all the considerations, so these are just my perspectives. I also realize that while annexation has to be considered when drafting the Our Missoula 2045 plan, it is the responsibility of others to identify the areas to be considered for annexation.

I also realize the plan is focused on the next 20 years, but I feel like you ought to do some very general projections and planning for the next 100 years, and include that in the 2045 plan. My prediction is that in the next 50-100 years the entire Missoula valley floor, from Mount Sentinel to Huson, and North Hills to Blue Mountain, will be urban, with 3 city centers. Probably 3 different cities that are part of one urban district that work together on common needs, with city centers in Missoula (already existing), the Wye, and Frenchtown. All of these cities would have their own infrastructure (water, sewer, etc) and major shopping centers. Some major services, like hospitals, may still be in Missoula only. Not sure if all 3 could meet the definition of the 15-minute city, but it ought to be a rough goal.

Thanks

John Oetinger

1500 Sunflower Dr

Missoula MT, 59802, USA

406-370-7583

johnoetinger@outlook.com

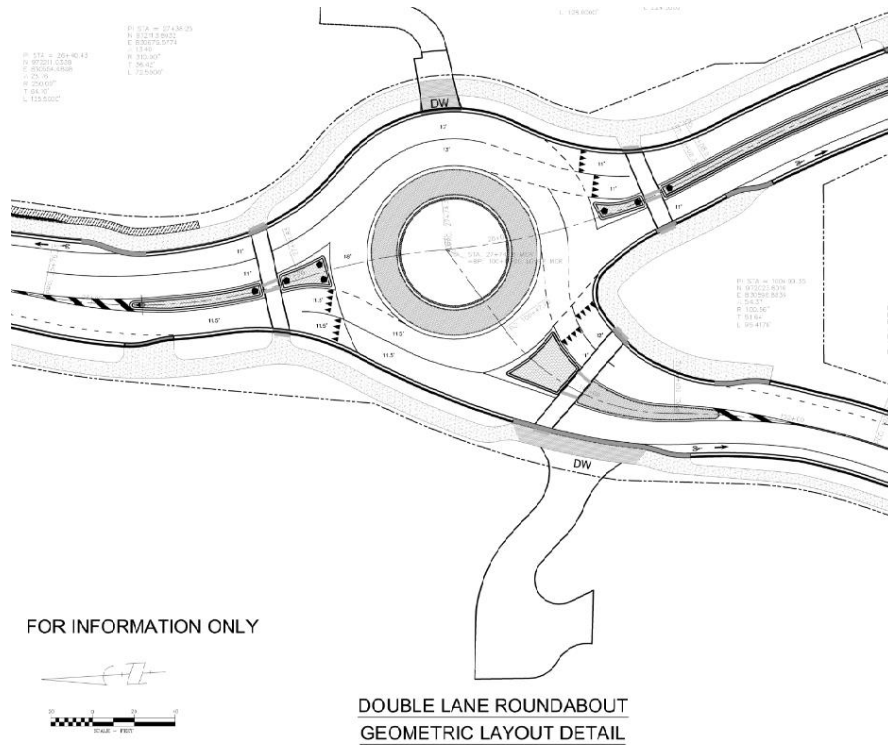
From: Greg Beach <gbeach@beachtrans.com>
Sent: Wednesday, December 4, 2024 7:07 AM
To: Benjamin Brewer <BrewerB@ci.missoula.mt.us>
Cc: Laval Means (she/her) <meansl@ci.missoula.mt.us>; Kate Dinsmore <kdinsmore@wgmggroup.com>
Subject: RE: 5015 Orchard St.

You don't often get email from gbeach@beachtrans.com. [Learn why this is important](#)

Hi Ben,

Thank you for the response and I understand that the comments need to be directed to city council at this point, but I wanted to give you some additional context for the request to the change to the land use designation.

- 1) There has been and will continue to be a lot of growth in the Lower Miller Creek area. With this growth, providing a node for neighborhood commercial services seems appropriate and commercial uses in this area would have a logical connection to the existing commercial corridor along Brooks.
- 2) With the growth in the Lower Miller Creek area comes more traffic which could support the commercial uses at this property and be beneficial to the neighborhood. Additionally, the detached, single-family residences along Lower Miller Creek in this area don't seem as desirable as other residential building types that provide more density. I'm not sure people would choose to buy a single-family residence on Lower Miller Creek with the amount of traffic on that street.
- 3) While the primary access is currently off Orchard, adding a fourth leg to the roundabout is feasible and would be the desired access to the property to support commercial and higher density residential development. The roundabout was designed to expand to a double lane roundabout anticipating future traffic needs.



- 4) The county zoning currently allows tri- and quad-plex buildings and multi-plexes that are part of a permanent affordable housing or conservation design development while comparable city zoning only allows single-family and duplex building types. As the city's new zoning is developed, I would support allowing these additional building types on the property within the new zoning district to support maximizing the allowable density. In other words, allowing additional building types would provide more variety in housing types to support more housing needs and likely lead to development at a higher density to help meet housing goals.
- 5) Lastly, the request to change the land use to Urban Mixed-Use Low may have felt aggressive, but the intent was to maximize the potential of the property while providing a commercial space in character with the neighborhood needs while also adding density to provide needed housing. I understand the desire to be considerate of the existing residents in the area and to reflect the county's planning efforts. However, looking to the future and the opportunity this property offers, Urban Residential Low may be more fitting to meet everyone's needs.

Greg

From: [Karen Slobod](#)
To: [Emily Gluckin \(she/her\)](#)
Subject: Growth Plan Comments
Date: Wednesday, December 4, 2024 11:37:57 AM
Attachments: [feedback for Missoula growth 2024.pdf](#)

You don't often get email from karenslobod@gmail.com. [Learn why this is important](#)

Hi Emily!

URBAN RESIDENTIAL HIGH

- Suggest as 4-story apartment buildings spring up in Franklin-to-the-Fort and other URH areas, the character of these neighborhoods will change dramatically — which will result in community pushback. My suggestion is to include in the zoning a package of design standards with enough articulation ((second floor setbacks, and varied profiles) so that they fit into the neighborhoods and the community can accept them. The areas designated URH are the less affluent home owner areas — sensitive FBC zoning will protect them from a monoscape of block-shaped apartments
- Suggest adding Vertical Mixed-Use to Building Types.
- Suggest the City purchase some of the best multi-family building plans from local architects to offer to new developers — speeding the approval process and insuring that neighborhoods change in ways property owners feel good about.

URBAN RESIDENTIAL LOW

- Suggest adding Vertical Mixed-Use to Building Types.
- Suggest eliminating new Strip Malls in Building Types (Mixed-Use Vertical will support our goal of housing density — Strip Malls will take us in the other direction).
- Suggest including FBC design standards in zoning package.

RURAL RESIDENTIAL

Within this designation include zoning for community hubs (services/ groceries) so that as new subdivisions are developed, the neighborhoods are walkable (part of our sustainability commitment and traffic mitigation plan.)

DOWNTOWN

- Suggest 110' for Downtown.
- Suggest shorter height for Hip Strip area and east of Washington and west of Orange (with building heights for those areas capped at 6 stories / 75' because 10 story building in a residential adjacent neighborhood can stick out like the Space Needle. These shorter heights give the City the opportunity to negotiate with developers for higher density/more stories for the addition of more affordable units. Also building heights can increase as the City fills in. (See Rural to Urban Transect Planning <https://www.cnu.org/publicsquare/2017/04/13/great-idea-rural-urban-transect>)

URBAN MIXED USE HIGH

- Suggest 6 stories / 75' feet (These shorter heights give the City the opportunity to negotiate with developers for higher density/more stories for the addition of more affordable units.)
- Suggest extending this zoning area along Broadway to the airport and along the Reserve and Brooks corridors. Suggest removing Strip mall inclusion.
- Our zigzag building placement on corridor boulevards makes the streets unsafe and unwalkable. The new vertical mixed use zoning will go a long way to correct this issue, in order for that to work, we need to include zoning for building placement for new development (to sit parallel to the street —creating a consistent street wall and walkable / bike-able complete streets.
- Zoning some intersections with a prescriptive (replace parking lot with a mixed-use vertical or liner building, pocket park, removal of short angled streets, etc.) will help us convert our corridors to vibrant, safe areas of town.
- Suggest including zoning for pocket parks and plazas.
- Suggest eliminate setbacks on corridor boulevards.

URBAN MIXED USE LOW

- Our zigzag building placement on corridor boulevards makes the streets unsafe and unwalkable. The new vertical mixed use zoning will go a long way to correct this issue, in order for that to work, we need to include zoning for building placement for new development (to sit parallel to the street —creating a consistent street wall and walkable / bike-able complete streets.
- Zoning some intersections with a prescriptive (replace parking lot with a mixed-use vertical or liner building, pocket park, removal of short angled streets, etc.) will help us convert our corridors to vibrant, safe areas of town.
- Suggest including zoning for pocket parks and plazas.
- Suggest eliminate setbacks on corridor boulevards.
- Suggest area between the railroad tracks and Toole be designated Urban Residential — the fabric of that neighborhood will be too greatly impacted if it becomes Mixed-Use Low.

SUBURBAN MIXED USE

- See “Our zigzag building placement on corridor boulevards makes the streets unsafe” above.

INDUSTRIAL AND EMPLOYMENT

- Some areas like Roseburg Forest Products will be selling and there is potential for housing in those areas after clean-up (as they are fairly close to city center)— so suggest transitional zoning.
- Suggest cottage industry/makers space zoning added to housing types.

CIVIC

* Suggest Building Types include eateries and marketplaces because some civic buildings could house restaurants with rental agreements that would bring the city income, and indoor farmers markets/food halls would support our sustainability goals.

GENERAL:

- Suggest Identifying neighborhoods with a lack of walkable services/ food options and zone small islands of Mixed-Use plus pocket parks /plazas. (Did you know that one of the reasons Portland has so many charming, walkable neighborhoods is that much of the City originally had a grid of cable car stops across it? The stops were zoned mixed use — so eateries and shops grew up around them —even in residential neighborhoods, making much of Portland a short distance from something fun and/or convenient.)
- Suggest the proviso “Incorporate appropriate street wall height” could be clarified by including specific triggers for height allowance — like “no more than two stories above existing street wall structures.”
- Suggest changing our asphalt zoning directives to help mitigate rising temperatures in the summer — to slimmer residential street requirements (some municipalities use 26’ widths and soft shoulders for emergency vehicles), shorter driveway lengths required, permeable pavers allowed in some cases, and bioswales for rainwater.



From: [Bob Giordano](#)
To: [Benjamin Brewer](#)
Cc: [Adam Hertz](#); [Christopher Chitty](#); afmccormick@garlington.com; [Heather McMilin](#); [Brittany Palmer](#); ["tmclure@allnations.health"](mailto:tmclure@allnations.health); [Paul Filicetti](#); [Bryan von Lossberg](#); [Justin Metcalf](#); [Kat Cowley](#); [Ryan Salisbury](#) (RSalisbury@wgmgroup.com); [Megan Robson](#); ["aimee@bettysdivine.com"](mailto:aimee@bettysdivine.com); ["leslieannjensen@gmail.com"](mailto:leslieannjensen@gmail.com); tungtpham@gmail.com; [Eran Pehan](#); [Andrea Davis](#); [Laval Means](#) (she/her); [Emily Gluckin](#) (she/her); [Ashley Brittner Wells](#) (she/her); [Ben Weiss](#); [Aaron Wilson](#); [Samantha Suter](#); [Jennifer Savage](#) (she/her); [Eric Melson](#); [Sierra Farmer](#); [Mirtha Becerra](#); [Gwen Jones](#); [Daniel Carlino](#); [Amber Sherrill](#); [Mike Nugent](#); [Stacie Anderson](#); [Bob Campbell](#); [Sandra Vasecka](#); [Kristen Jordan](#); [Neighborhood Council - Lower Rattlesnake](#); [Neighborhood Council - Upper Rattlesnake](#)
Subject: Land Use Plan comment, adjusting "LUR" place type language, for Rattlesnake
Date: Wednesday, December 4, 2024 2:03:36 PM

Dear City Council, Land Use Planners for Missoula,

At our Dec. 3rd Rattlesnake Transportation Committee meeting, our group of 10 unanimously supported a language change for the place type, 'Limited Urban Residential' (LUR). LUR comprises much of our neighborhood, the Rattlesnake Valley.

The language change is focused on softening the notion that the Rattlesnake Valley is- and will always be- very car-dependent.

As the plan is aspirational, we believe that over time the Rattlesnake can be much more 'multi-modal', with walking, biking and transit playing a stronger role in meeting our collective mobility needs. Contributing factors include: safer and more accessible walk and bike ways, trail extensions, more frequent transit and mixed use development.

As a subcommittee of both the Upper and Lower Rattlesnake Neighborhood councils, and with support of those councils, we hope that you will adopt our suggested word changes for LUR. The changes are shown below. Thank you for your work on setting the stage for future growth in Missoula.

Sincerely,
Bob Giordano, Chair, Rattlesnake Transportation Committee,
and member of the Our Missoula Citizen Advisory Group

--

Limited Urban Residential (LUR)

original:

These quieter neighborhoods are located on the outskirts of the city core that have more limited transit options and rely heavily on cars for transportation. Sometimes these places are closer to the city core but include or are near environmental or topological constraints or hazards that influence how these areas can develop and grow.

These areas primarily offer homeownership opportunities, mainly through single-family homes and duplexes, with some medium to large-scale multi-dwelling developments along collector streets. Housing variety is moderate, spanning single family homes to limited "missing middle" housing options, with buildings that often feature medium to large setbacks that allow for driveways and on-site parking. It is less common for streets to be accompanied by alleys, which often means that on-site

parking and garages are accessed directly from the street.

While amenities like parks and schools may be within walking distance, these areas are primarily car-dependent to access services, with biking as a secondary mode of travel. There may be dedicated trails and routes that support biking and walking, but walkability is less emphasized than in more urban neighborhoods. Longer commuter trails connect these neighborhoods to more urbanized areas with commercial services and employment opportunities.

Edits:

These quieter neighborhoods are located on the outskirts of the city core and have more limited transit options (strike: and rely heavily on cars for transportation). Sometimes these places are closer to the city core but include or are near environmental or topological constraints or hazards that influence how these areas can develop and grow.

2nd paragraph OK

While amenities like parks and schools may be within walking distance, these areas (change, 'are primarily car-dependent to access services, with biking as a secondary mode of travel' to 'also rely on driving and cycling to access services'). (strike: 'There may be dedicated trails and routes support biking and walking, but walkability is less emphasized than in more urban neighborhoods'). Longer commuter trails connect these neighborhoods to more urbanized areas with commercial services and employment opportunities.

Proposed version:

These quieter neighborhoods are located on the outskirts of the city core and have more limited transit options. Sometimes these places are closer to the city core but include or are near environmental or topological constraints or hazards that influence how these areas can develop and grow.

2nd paragraph same as original

While amenities like parks and schools may be within walking distance, these areas also rely on driving and cycling to access services. Longer commuter trails connect these neighborhoods to more urbanized areas with commercial services and employment opportunities.

--

Sincerely,
Bob Giordano, Chair, Rattlesnake Transportation Committee,
and member of the Our Missoula Citizen Advisory Group



5225 West Broadway | Missoula, MT 59808
www.flymissoula.com | 406-728-4381

December 4, 2024

City of Missoula
435 Ryman St.
Missoula, MT 59802

RE: City of Missoula 2045 Land Use Plan

Dear Mayor Davis and Council Chair Sherrill:

Please accept this letter as official agency comment for the City of Missoula's 2045 Land Use Plan (City's Land Use Plan) on behalf of the Missoula County Airport Authority ("Airport"). The Airport is obligated under the Federal Aviation Administration ("FAA") Grant and Sponsor Assurances to take appropriate action, to the extent reasonable, to restrict the use of land adjacent to or in the vicinity of the Airport to activities and purposes compatible with normal airport operations. Montana has also addressed this issue by enacting the Airport Affected Areas regulations, formerly referred to as the Airport Influence Area ("AIA"). Title 67, Chapter 7 Mont. Code Annotated. Missoula County enacted the AIA regulations in 1977, Missoula County Resolution 78-96. The Airport's obligations include reserving the right to object to land use actions as it relates to the public safety of the users of the Airport and within the AIA.

The City's Land Use Plan identifies the land use categories of "Urban Residential High" and "Urban Mixed-Use Low" directly east of Airport property, which is within the AIA, is located along the flight path of the primary commercial runway at the Airport and is within the 65 DNL sound contour established through the Federal Aviation Administration (FAA). Pursuant to guidance from the FAA, uses such as residences (especially residential uses with higher than 1-2 houses per acre), schools, hospitals, nursing homes and churches are incompatible in this proximity to the Airport.

The issues that make the land use categories in the City's Land Use Plan incompatible with the property in the vicinity of the Airport are as follows:

- The impact of aircraft noise on individuals residing directly under a runway flight path and within the 65 DNL noise contour;
- Safety issues involved with aircraft accidents along the Airport's flight path and in the runway protection zone;
- Electronic interference with aviation navigation aids within the AIA; and
- Physical and visual obstructions to safe aviation navigation within the AIA.

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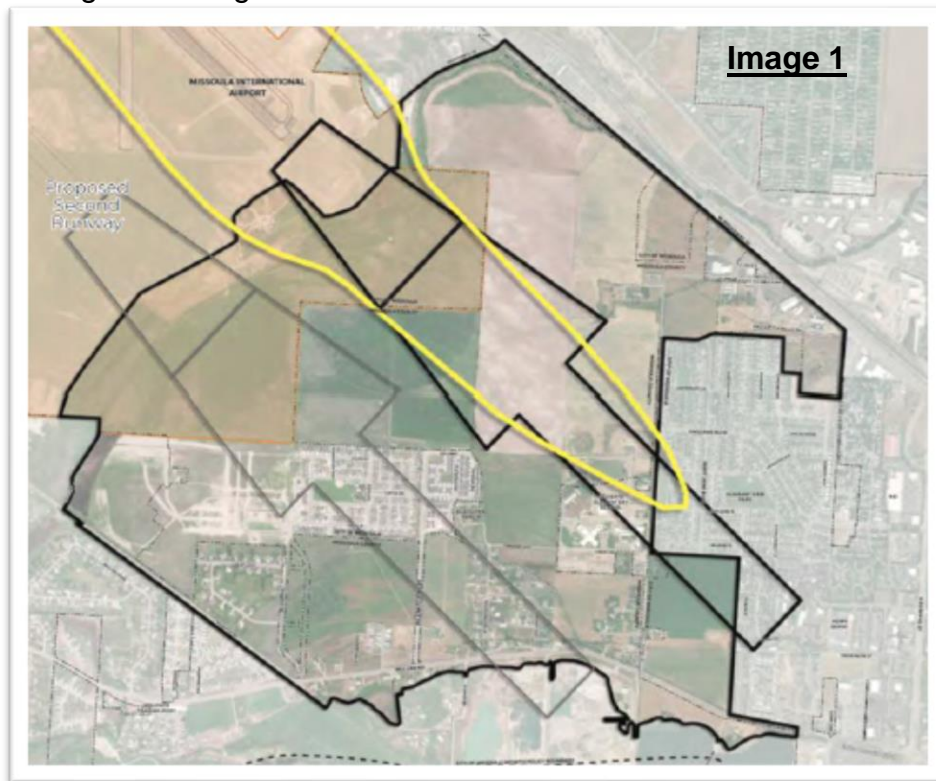
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Aircraft Noise

The FAA has adopted 65 DNL¹ as the threshold of significant noise exposure, below which residential land uses are compatible. The yellow boundary depicted on the map included below as Image 1 shows this 65 DNL contour line; this contour line extends into land use categories identified in the City's Land Use Plan as "Urban Residential High" and "Urban Mixed-Use Low", both of which envision dense residential development.

Aircraft noise significantly impacts individuals residing near airports, exposing them to higher levels of noise pollution which can lead to health issues like sleep disruption, stress, cardiovascular problems, and reduced cognitive function. Those impacts usually fall disproportionately on low-income communities and communities of color. See [Aviation Noise Impacts: State of the Science - PMC](#) for citations to studies that show these health and socio-economic impacts.

FAA funding for noise mitigation near airports is extremely limited and no funds are available for mitigation efforts to residences built within an existing 65 DNL noise contour. Permitting residences in the areas of the greatest noise impacts, particularly without zoning and building restrictions that require noise mitigation in the design/construction process, opens local governments and the development community up to public criticism and potential legal challenges.

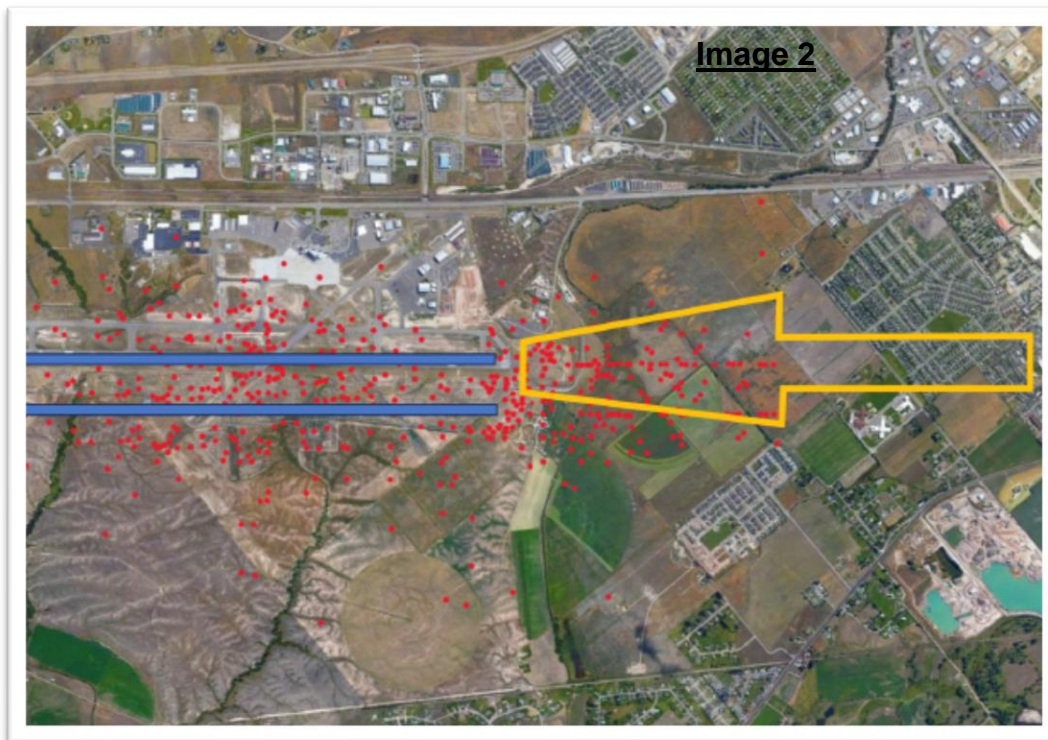


¹ The DNL65 does not refer to decibels. It is a formula that attempts to combine all the flights someone might experience over their head every day and night into one number.

Safety

The number of people concentrated in an area near an airport is the land use characteristic tied most closely to the consequences of aircraft accidents. The most direct method of reducing the potential severity of an aircraft accident to the people and property in proximity to an airport is to limit the maximum number of structures and/or people in areas close to an airport. Limiting the number of structures around the airport may also reduce the severity of an aircraft accident to passengers on board the aircraft.

Concentrated populations increase the risk of severe consequences in the event of an uncontrolled accident. The risk is even greater when the land use includes occupants with limited mobility or who need supervision or assistance in evacuating, such as hospital patients or schoolchildren. The red dots on the map included below as Image 2 depict the modeling data that was derived from 15 years of worldwide airport accident data.



Interference and Obstructions

Another important airport land use compatibility concern is the need to maintain unobstructed space for aircraft to maneuver above ground, protect navigational facilities, and protect existing and future airport capacity. Airspace can be physically obstructed by



tall structures and vegetation and visually obstructed by glare, light emissions, dust, and smoke. Additionally, land uses that can produce electronic interference should be

carefully considered. Electronic interference can affect navigational aids used by pilots during takeoff and landing.

The FAA has a system of standards and notification procedures to protect national airspace from physical obstructions. See 14 CFR Part 77. These standards are encompassed in the Airport Affected Area regulations set out in Montana Code Annotated Title 67, Chapter 7. The City of Missoula has a statutory responsibility to adopt an Airport Affected Area, and doing so would ensure the City's compliance with 14 CFR Part 77.

Summary

The current version of the City's Land Use Plan identifies the land use categories directly east of Airport property which are not compatible with the Airport. Uses such as high density residential, schools, hospitals, nursing homes and churches are incompatible in this proximity to the Airport. The Missoula County Airport Authority respectfully requests that the land use categories within the Airport Influence Area be amended to exclude such uses.

There are a variety of tools that are available to local governmental entities to influence the outcome of development on areas adjacent to airports, including but not limited to:

- Adopting zoning and land use policies that prevent incompatible uses within the AIA, in the flight path, and within the 65 DNL noise contour;
- Adopting building codes and zoning ordinances that require noise abatement measures in the building process, height restrictions, and other related restrictions; and
- Executing avigation easements for all property within the Airport Affected Area ("AAA") under local regulations implementing Title 67 Chapter 7, MCA.

We believe that the strong and consistent use of these tools must be used to ensure land use compatibility in the Airport's vicinity. The City's Land Use Plan is an important part of our community's land use policies and should reflect the very real realities of the existence of the Airport in an ever-growing valley. We remain a committed partner in planning for our community's growth and we welcome the opportunity to work collaboratively with the City to implement solutions to the concerns addressed in this letter.

We would like to continue this conversation in-person by way of additional stakeholder meetings or by providing comments during a public session. Please let us know the best

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way to ensure our concerns are addressed within the City's Land Use Plan. Thank you for the opportunity to comment on this and any future land use actions occurring adjacent to or in the vicinity of the Airport.

Respectfully,

Brian E. Ellestad

Brian Ellestad, Airport Director

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From: Peter Lesica <lesica.peter@gmail.com>

Sent: Wednesday, December 4, 2024 7:12 PM

To: Ashley Brittner Wells (she/her) <BrittnerWellsA@ci.missoula.mt.us>; Benjamin Brewer <BrewerB@ci.missoula.mt.us>

Subject: Land Use Plan

Dear Ashley & Ben,

I have pretty much gone through the land use plan. You have done a lot of good work, and I know you have heard from me speaking on behalf of the Rattlesnake Valley before. I simply hope that the City keeps in mind possible emergency evacuation scenarios when considering housing density in the Rattlesnake neighborhood. We only have two roads leading into and out of the Rattlesnake, and traffic can get clogged very quickly. When we hosted a general meeting of the Upper and Lower Rattlesnake Neighborhoods in April of this year, the Missoula County Office of Emergency Management provided some emergency evacuation scenarios. The scenarios indicated that it could take up to six hours to evacuate the entire Rattlesnake neighborhood.

There are several places where the plan addresses these concerns in one way or another:

Page 16 Our Goal: Ensure access to services and infrastructure that support health and safety.

Page 19 Restrict development in hazard-prone areas, mitigate development on sensitive lands, and focus growth towards safe, urbanized areas with existing infrastructure.

Page 42 Comprehensive planning for emergencies including in areas of higher fire risk is essential.

Page 91 Missoula's well-being, safety, quality of life, and economic resilience hinge on the presence of high-quality streets and efficient transportation networks.

I hope that during the zoning phase of this project, the people in charge take the above goals seriously, especially when it comes to the Rattlesnake.

Thanks for all your hard work,

Peter

Konveio Comments Received as of 12.5.2024

Date posted	User name	Comment	Page	Agree	Disagree
11/28/2024 - 10:02am	Shannon Hilliard	<p>In my experience, income restrictions for permanently affordable housing need to be very well vetted. If an income restriction for a specific home is so low (below 80% AMI) that the household who qualifies for the housing cannot qualify for a loan to purchase the home, it becomes stagnant on the market, and sits vacant. Interest rates can drastically affect the size of the demographic that fits into the right box to qualify. I suggest the city/county considers using the housing trust fund or other resources for low interest loans (for people who qualify based on income) to buy market rate housing. That will lead to greater diversity in neighborhoods and avoid creating "low income districts." I fear that the practice of creating permanently affordable housing with deed restrictions will further lead to segregation within our community. □</p>	28	0	0
11/15/2024 - 10:58am	David V. Gray	<p>The County Golf course and lands at the Fort are very suitable for residential and mixed-use development in the next 20 years. The Nursing school is expanding to the Hospital campus and housing for that school and staff will be needed. As Missoula residents age it is also a great place for age in place housing for the elderly.</p>	31	1	0

11/30/2024 - 12:04pm	Juan	<p>I appreciate your efforts to constrain city growth, but adding the amount of density to the city as proposed is a bad idea. To maintain the city as a livable place for it's residents, the Missoula boundaries will have to be expanded. Traffic congestion has already become unreasonable in many parts of the city during morning/late afternoon commute times. Increasing infill in the city will lead to traffic gridlock given the bottleneck that occurs with our limited roads and having ONLY FOUR bridges crossing the Clark Fork River on our major arteries. This plan seems to make an assumption that removing parking requirements will incentivize us to sell our vehicles, which is absurd. As long as 90% of the USA is accessible only by car, no one is going to willingly become homebound in Missoula regardless as to how robust the public transportation system is.</p>	31	1	0
11/15/2024 - 11:01am	David V. Gray	<p>This diagram is so inaccurate it should be struck from the plan. More density means large buildings to provide equity and affordability to Missoula residents and future generations. Do not post inaccurate diagrams to lead the public astray of that fact. I feel it would be better to show how densifying the city core will actually mean larger buildings in existing neighborhoods.</p>	35	1	0

11/19/2024 - 6:50pm	Mary and Patrick Donnel	<p>We are supportive of the efforts to maintain the rural character of our neighborhood and the Missoula we love. Upper Miller Creek and other sections of the Miller Creek Valley. It would be important to us and many of our county neighbors not to be annexed into the city over the next 20 years. We understand the current annexation policy is by petition of the land/ home owners. We would appreciate maintaining that policy. What we value - To sustain the gardens, orchards, pastures and rural land, which is a major part of the character and beauty of this area. We already have enough growth in Upper and Lower Miller Creek by the expansions around LINDA VISTA and Maloney Ranch, and the new development by the River. ☐</p> <p>☐</p> <p>Run away property taxes and several other issues not yet addressed by the legislature and the city play apart in this comment. ☐</p> <p>☐</p> <p>Thank you for adding this comment for review. We have been participating in county planning efforts for many years now and we hope our comments count. ☐</p> <p>☐</p> <p>One last side note: We would also be supportive of other rural neighborhoods looking to maintain their rural community as well - Target Range, Orchard homes and the Upper Rattlesnake!☐</p>	59	1	0
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11/15/2024 - 11:13am	David V. Gray	I feel this statement is very inaccurate as it states the new development will match the existing neighborhood yet the new construction can be 4 stories. The F2F Neighborhood is one and two story small footprint homes with 3 story Multifamily apartments being built dwarfing existing small unaffordable homes. Ward 3 East of the F2F is similar for existing scale of buildings yet new buildings are proposed at 4 stories. I feel it would be more accurate to state that the needed new dwelling units and development in this place type will become larger to provided equitable and affordable development for the benefit of future generations.	67	0	0
11/15/2024 - 12:24pm	Bob Giordano, MIST	A Park Access street might be considered a Neighborhood Greenway in some instances. Sometimes a Greenway might connect to a park, and then the park connects to another Greenway. Alvina Drive is an example- it connects to Greenough Park, which then connects to other trails and greenways in the Lower Rattlesnake.	95	0	0
11/16/2024 - 2:01pm	Bob Giordano, MIST	Get rid of: 'Many Missoula streets do and will continue to carry high volumes of motor vehicles,' - it is not needed, likely false and only serves to strengthen a status quo that Missoula is moving beyond. The rest of the sentence can stay- change 'and' to 'any' though.	95	0	0
11/19/2024 - 6:13pm	Adam Cook	With so few areas in the South Hills designated urban residential and urban mixed use, this area seems certain to drive disproportionate road demand and infrastructure costs. More amenities should be allowed in this neighborhood so that it can become self-sufficient, rather than generating traffic for other neighborhoods.	108	1	0

		<p>While I really do appreciate the thoroughness of this exercise, I feel like the whole thing was a bait and switch. First you expound on the lofty goals of equity and green spaces, and mixed use and walkability and accessibility, and then completely ignore how the 'infill' of the Urban Residential High neighborhoods will place an extra burden on the existing amenities there, while also contributing to the feeling of over-crowding and changing the overall feeling of these long-established neighborhoods that have already begun to gentrify. I also feel like those areas designated limited urban residential (South and West) are a disingenuous way to create protected and siloed upper-class neighborhoods that don't have to absorb any more population growth, while taxing the amenities in other neighborhoods and using up an outsized portion of city services. These should actually be the neighborhoods to 'infill', not those in which we are already being threatened with the looming shadows of new apartment complexes. More should be done to locate denser areas in the south and west of town to act as satellite 'downtowns'. Also mentioned in this plan is the value of green spaces offered by empty lots or slightly larger gardens in those older neighborhoods, which infill would drastically reduce. The reliance on finding places to locate housing only promotes overcrowded neighborhoods without adequate commercial spaces nearby to work or grab a coffee, or go bowling!</p>			
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12/03/2024 - 11:11pm	Martine Holmquist	Wouldn't it be great to walk to a local hardware store or bakery instead of driving to Reserve Street? What about keeping those neighborhoods urban low or medium density and introducing some more mixed urban mixed-use low. And about downtown: will it become just another glitzy Miami or Bozeman? With over-priced condos on the river that don't at all fit in with the style of the bungalow next door and whose denizens don't care to rub elbows with cleaning women and gardeners. Please do something to prevent another ROAM student housing complex from going up, or mandate a higher standard of architecture. That thing looks like a prison.	108	0	0
11/19/2024 - 6:10pm	Adam Cook	There really should be much more area designated urban mixed-use close to the University. All of Beckwith, Arthur, 5th, 6th, University, and Maurice would be a *start.* It is perplexing that housing and amenities for students and staff are so limited near campus, and that we would undertake code reform without fully addressing the issue.	108	1	0
11/16/2024 - 11:46am	Bob Giordano, MIST	The Bike/Ped Alliance no longer exists.	117	0	0
11/24/2024 - 4:04pm	Chester	I notice that it says electric vehicle infrastructure, without buying everyone a electric vehicle this seems very 1 sided and if it increases taxes I am going to be very hostile to the idea instead of investing in trolleys or other means of public transportation.	119	1	0
11/16/2024 - 11:43am	Bob Giordano, MIST	For incorporating more sustainable building materials, we should move quicker than the proposed 5-9 year time line. 1-4 years would be much better and is feasible. Sustainable materials such as cob, clay, fiber, wood and stone can help Missoula become a healthier city, and save money. These materials can often replace concrete, asphalt, metals and petroleum plastics.	119	0	0
11/24/2024 - 4:10pm	Chester	Who is this benefiting?	121	0	0

11/24/2024 - 4:13pm	Chester	Benefits the developers and not the people living and experiencing the area. Could do with more Diversity, Equity, and Inclusion	121	0	0
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