

EST. 1982

MISSOULA *aging* **SERVICES**

WE'RE PROUD *of* OUR YEARS

December 9, 2024

Dear Members of the Missoula City Council,

Missoula Aging Services (MAS) is dedicated to promoting the independence, dignity, and health of older adults. MAS provides more than 20 programs and services that help older adults age in place and support family caregivers. One of MAS' key interests is to increase the availability of suitable housing for the nearly 20,000 older adults who live in Missoula County. Our Strategic Plan envisions a community in which:

- Older adults have safe, stable housing rooted in the community as the foundation upon which all other critical supports sit, and as a key to averting crises.
- Housing options are broad and designed or modified for older adults to live safely and comfortably in their homes.

We are writing regarding the Our Missoula 2045 Land Use Plan and Code Reform draft, which thoughtfully addresses the pressing need for affordable and accessible housing options in our community. We also wish to express appreciation to the City of Missoula Community Planning, Development, and Innovation team for repeatedly seeking input throughout the planning process from MAS staff and our Advisory Council, the majority of whom are older adults.

The following components of the draft speak to the housing needs of older adults, with an emphasis on community access, connection, and inclusion:

- Focusing on affordability as many older adults experience economic insecurity
- Encouraging universal design and visitability in both new development and the adaptation of existing spaces, as well as in the creation of "third places," to increase overall accessibility

T 406.728.7682 **F** 406.728.7687

337 Stephens Ave | Missoula, MT 59801

MISSOULAAGINGSERVICES.ORG

EST. 1982

MISSOULA *aging* **SERVICES**

WE'RE PROUD *of* OUR YEARS

- Increasing mixed use development, which affords older adults easier access to goods, services, and amenities
- Increasing overall housing capacity near key transit corridors, and speaking to the related need for more and well-maintained sidewalks, which enhances mobility and independence
- Adaptive reuse of existing buildings, offering the potential to create age-friendly housing within established neighborhoods that fosters community continuity and allows older adults to age in place
- Facilitating the development of diverse housing choices that cater to changing needs and preferences at different stages of life
- Acknowledging the importance of respecting history and culture

As one-quarter of the population in the Missoula area is aged 60 and older and approximately 1 in 3 households includes an older adult, we encourage the City to continue to consider their needs in the implementation phases. We especially hope to see specific standards and incentives that address accessibility across a wide range of housing options, particularly those that are developed nearest to essential services. We also urge the City to actively seek and support the development of options that are designed with aging in place in mind and that maximize inclusion.

We are looking forward to working with the City and other community partners to address the housing needs of older adults and welcome the opportunity to inform the conversation regarding best practice models and promising strategies.

Sincerely,

Lisa Sheppard, CEO and Greg Oliver, Governing Board member

T 406.728.7682 F 406.728.7687
337 Stephens Ave | Missoula, MT 59801
MISSOULAAGINGSERVICES.ORG

From: [Adam Cook](#)
To: [Emily Gluckin \(she/her\)](#)
Subject: Final land use plan observations
Date: Sunday, December 8, 2024 3:42:33 PM

You don't often get email from cook82291@gmail.com. [Learn why this is important](#)

Hi Emily; hope things have been going well. I recently had a good conversation with Ben about some of my final observations for the new land use plan. Since the final adoption of the plan and the deadline for comments are fast approaching, I wanted to bring the same items to your attention.

Broadly, I think the plan is a major improvement but I'm concerned about certain vague definitions contained in it. Some of these issues may be fixed once our building code is finalized, but some aspects certainly seem to offer opportunity for people who wish to throw a wrench in new housing construction. Chief among these are the descriptions under the "Built Form" heading in the LUP's place type description. First, for all of the residential place types except "rural residential," the built form section specifies that building scale should be "compatible with existing houses." It seems pretty clear that this creates uncertainty that could result in endless litigation of new zoning codes as well as individual projects. Even if zoning is clarified, such qualitative criteria could result in huge delays for much-needed housing as developers are forced to make many rounds of minor changes to plans in order to receive final approval. This would be especially problematic somewhere like the University District, where the need for housing is most acute yet wealthy residents are best equipped to fight it. A builder who relayed this concern to me suggested that an effective form-based zoning code should limit constraints to three variables:

1. Height
2. Setbacks
3. Parking

The LUP also alludes to FAR restrictions which I do not support (nor do I support parking requirements, but that is a discussion for another day). Regardless, the builder I spoke to felt that the qualitative aspects of the LUP definitions created enough uncertainty that they should be struck from the plan by city council as the LUP has already progressed to its final draft.

Similarly, I have concerns about the bullet point in the built form section that stipulates "adaptive reuse is preferred." I'm certainly supportive of unlocking housing capacity by allowing large single-family houses (or office buildings) to be split into multiple units, however the need to bring older buildings into compliance with modern codes has made these projects notorious for turning into money pits. Briefly, I don't think that any incentive extended to adaptive reuse should be *withheld* from new construction, and this seems like something that could be weaponized as a bad-faith tool to create de-facto housing limitations (e.g. by making onerous reuse requirements that make most projects unfeasible). I think we should either have a much clearer definition of this "preference" or strike the language entirely.

On a somewhat different note, I think that the "Industrial" place type should be made more flexible and accommodating. In its current iteration, this place type seems like a sacrificial category set aside for the most intensive uses with little consideration given to future changes. My view is that, even if that is reflective of current land use, the industrial place type should leave open the possibility of future housing and liveability improvements, firstly because changing urban boundaries may create future demand and secondly because it is sensible to

give people the option to live near employment opportunities in those areas if they wish, rather than commuting long distances. In my opinion, the industrial place type could be made better by:

A) Allowing housing by-right in industrial areas, except where made prohibitive by preexisting industrial hazards

B) Installing roads and utilities in industrial areas such that they can be reconfigured for multimodal improvements and mixed-use development at future dates

Finally, I want to speak out against the scaling-back of LUP changes in the Rattlesnake. As someone who has fought fire and has a lot of exposure to fire science, the idea that the Rattlesnake cannot densify due to fire risk and evacuation limitations represents an alarmist double standard, plain and simple. That huge, expensive houses have proliferated on Duncan and Lincoln Hills Drive shows this to be unserious; if taxpayers can be on the hook for \$60,000 airtanker drops to save mansions in the Upper Rattlesnake, it is outrageous to say that a 4-plex on Lolo street presents an unacceptable liability. If residents' true concern is an increase in traffic, then it is past time for the neighborhood to accept more mixed-use zones so that errands do not require travel into town. It does not take a transportation planner to note that car travel from the Upper Rattlesnake to city amenities imposes significant costs on residents and infrastructure in the lower valley.

Thanks for hearing me out; I look forward to engaging more in this project!

-Adam Cook
(801)410-3459

Date posted	User name	Comment	Page	Agree	Disagree
12/06/2024 - 11:40am	Ski	RT10 is not comparable to "Rural Residential" it should be listed under "Limited Urban Residential." RT10's setbacks, and therefore development patterns, are consistent with zones R8, R5.4 and RT5.4 as indicated on Table 20.05-3, all of which are in the "Limited Urban Residential" category.	73	0	0
12/06/2024 - 11:42am	Ski	There is no reason a neighborhood like Miller Creek couldn't support triplexes or quadplexes, if they can support townhomes. I believe the City should add "Triplex" and "Quadplex" to the list of allowable Building Types. There will ultimately be limits in the updated zoning code that will limit the building size/envelope, so we shouldn't be ruling out the building typology. If someone can make it work at the scale of buildings in that neighborhood, they should be allowed to do so. We need more housing.	73	0	0
12/06/2024 - 11:51am	Ski	RT10, R20 and R40 also include areas like Lower Miller Creek or Hellgate Meadows that are much more developed than those listed. Seems like this is almost too broad brushstroke. If we say those areas are rural are they farming and raising horses? Those are just single-family residential with larger than "urban" lots. This feels like we should have a high/low density separation here. Like "suburban residential" for lots less than an acre R20/R40 and use "rural residential" for the truly rural areas of the city R80/R215 (which should inherently be limited as cities are not "rural" as a rule). The suburban category should be hitting a density target like the limited urban zone in the forms allowed in the rural. So a 5-9 unit apartment complex (on almost an acre for R40) but limited in lot coverage, larger setbacks, and lower heights wouldn't impose significant changes to neighborhoods but has the potential to drastically increase our housing supply.	72	0	0
12/06/2024 - 12:05pm	Ski	This is a current use, but in our 20 year plan this isn't what we need in the UMH Zone. If we are using this plan to address the future needs of commercial services serving a city that has grown by at least 47% (37k more people) then we need to be thinking at a denser, walkable, urban scale. A city of 110K people is very different than a city of 77K people. We should allow for small storefronts to continue (be grandfathered in) but discourage future development in these high density mixed use corridors from being small.	76	0	0
12/06/2024 - 12:07pm	Ski	This is a current use, but in our 20 year plan this isn't what we need in the UMH Zone. If we are using this plan to address the future needs of commercial services serving a city that has grown by at least 47% (37k more people) then we need to be thinking at a denser, walkable, urban scale. A city of 110K people is very different than a city of 77K people. We should allow for strip malls to continue (be grandfathered in) but discourage future development in these high density mixed use corridors from being so spread out. Vertical mixed-use buildings on these sites which are more parking than building now, will allow for denser housing and more walkable neighborhoods in the future, which we need.	76	0	0
12/06/2024 - 12:11pm	Ski	Remove strip mall and small shopfront from this category. See my comments on pg 76. New buildings like this built in these zones over the next 20 years will still be there 40 years from now when we are two more cycles into this long-term land-use plan. These are two uses that if encouraged to continue to exist and be developed in a dense urban mixed-use corridor will be limiting our developable density, walkability and housing affordability for 40+ years.	77	0	0
12/06/2024 - 12:12pm	Ski	To be consistent with the listed building type uses, one of the quadplex graphics should be replaces with the multi-dwelling apartment graphic.	68	0	0
12/06/2024 - 12:40pm	Ski	The city should add a line item in the Code:A section : "Develop regulations that incentivize the production of permanently affordable housing throughout the city through site development bonuses." This should be apart of updating the zoning code, so timeline should be <1.	119	0	0