



## **CONDITIONAL USE STAFF REPORT**

**Agenda Item:** Referral and Staff Report - Conditional Use Request for Wireless Communication Facility at 5425 Gharrett Street

**Report Date:** 12/10/2025

**Case Number:** 2025-MSS-BRD-00011

**Case Planner:** Zoe Walters, Associate Planner, CPDI

**Report Reviewed & Approved By:** Mary McCrea, Permits and Land Use Manager, CPDI

### **Public Meetings & Hearings:**

City Council Consent Agenda: 12/15/2025

LUP Pre-Public Hearing Informational Item: 12/17/2025

City Council Public Hearing: 1/5/2026

### **I. GENERAL PROJECT INFORMATION**

#### **Applicant & Owners:**

Lighthouse Baptist Church  
5425 Gharrett St  
Missoula, MT 59803

#### **Representative:**

Frank Bodkier Jr.  
Tom Lemmons  
5425 Gharrett St  
Missoula, MT 59803

**Location of Request:** 5425 Gharrett Street, located between 55<sup>th</sup> Street and Briggs Street in the Moose Can Gully Neighborhood and City Council Ward 5 (Exhibit A).

**Legal Description:** Lot 16B of the 1st Amended Plat of South Side Homes Addition Lot 15 and 16, located in Section 6, Township 12 North, Range 19 West, P.M.M.

**Geocode:** 04-2093-06-3-01-06-0000

**Legal Notification:** A legal ad was published in the Missoulian on 11/29/25 and 12/6/25. The site was posted on 11/25/25. Adjacent property owners within 150 feet of the subject property were notified by mail on 11/19/25.

### **II. DECISION AND REGULATORY FRAMEWORK**

**Land Use Plan:** *Our Missoula 2045 Land Use Plan* is the applicable regional plan and designates a place type of Limited Urban Residential. This place type is primarily intended to offer homeownership opportunities through single-family homes and duplexes in quieter areas with limited transit, while also supporting a moderate variety of housing options. They aim to balance residential development with access to local amenities and connections to more urbanized areas through driving or cycling.

**Local Zoning Law:** Title 20, Missoula Municipal Code amended October 16<sup>th</sup>, 2023.

**Zoning Designation:** R8 Residential

**Surrounding Land Uses**

North: Residential – Single Detached Houses  
South: Residential – Single Detached Houses  
East: Residential – Single Detached Houses  
West: Residential – Single Detached Houses

**Surrounding Zoning**

North: City Unzoned  
South: City R8 Residential  
East: City R8 Residential  
West: R Residential – Missoula County

**III. RECOMMENDED MOTIONS**

**City Council Consent Agenda (12/15/2025)**

[First reading] **Set a public hearing** on January 5<sup>th</sup>, 2026, for the Wireless Communication Facility conditional use request located at 5425 Gharrett Street and **refer this item** to the Land Use and Planning Committee for presentation and discussion on December 17<sup>th</sup>, 2025.

**Land Use and Planning Committee (12/17/2025)**

No motion. Informational presentation, questions, and discussion.

**City Council Public Hearing & Final Consideration (1/5/2026)**

[Second and final reading] **Approval** of the Wireless Communication Facility conditional use request located at 5425 Gharrett Street, in accordance with the Missoula City Zoning Ordinance, Title 20, Sections 20.05.020.D, 20.40.160, 20.85.070, and 20.105.060.E, based on the findings of fact in the staff report and subject to one condition of approval.

**IV. CONDITION(S) OF APPROVAL**

1. The Wireless Communication Facility conditional use at 5425 Gharrett Street shall comply with all applicable portions of the Title 20 Zoning Ordinance. Plans submitted at the time of building permit application shall substantially conform to the plans submitted at the time of conditional use review, subject to review and approval by Development Services prior to building permit approval.

**V. INTRODUCTION**

The City of Missoula Development Services has received a conditional use request from Frank Bodiker and Tom Lemmons of Lighthouse Baptist Church for a ground-mounted Wireless Communication Facility to be located at the property addressed as 5425 Gharrett Street in Missoula. The existing use of the property is Religious Assembly, and the applicant is proposing a radio tower as a Wireless Communication Facility. The applicant is requesting the conditional use to provide a federally licensed, low-power FM radio station to serve the local Missoula community with educational, religious, and public service programming. The radio tower would be located in the southwest corner of the parcel. The proposed tower

height is 80 feet. In addition to the tower there would be an associated transmitter shed, vehicle barriers, and fencing.

The subject property is zoned R8 Residential. Title 20, Section 20.05.020 requires conditional use approval to establish a ground-mounted Wireless Communication Facility in the R8 zoning district. Title 20, Section 20.105.060 defines a Wireless Communication Facility use as “Facilities related to the use of the radio frequency spectrum for the purposes of transmitting or receiving radio signals, and may include, but is not limited to, radio towers, television towers, telephone exchanges, micro-wave relay towers, telephone transmission equipment buildings, commercial mobile radio service facilities or other personal wireless services (such as cellular, personal communication service, paging, specialized mobile radio, and other similar services.) This use category includes all associated equipment unless the written context clearly indicates that another meaning is intended. The term "associated equipment" is to be read broadly and in context. Associated equipment may include, but is not limited to: antenna, equipment shelter or platform, lighting, monopole tower, mounting hardware, supporting electrical or mechanical equipment, access road, and guy system.

## **VI. APPLICABLE ZONING REGULATIONS IN TITLE 20**

Title 20 Zoning Ordinance, Section 20.85.070.H outlines the review criteria for review of conditional use applications. According to the Zoning Ordinance, “not all review criteria will apply in every case... [and] only the applicable review criteria need to be met.” Uses that require conditional use approval may be approved by the City Council only when Council determines that the proposed uses meet all the applicable review criteria. Section 20.85.070.I “Factors to be Considered” states that in determining whether all applicable review criteria have been satisfied, the City Council may specifically consider agency and public testimony.

## **VII. CONDITIONAL USE REVIEW CRITERIA**

### **Findings of Fact:**

#### **General**

1. The subject property is located at and addressed as 5425 Gharrett Street.
2. The subject property is legally described as Lot 16B of the 1st Amended Plat of South Side Homes Addition Lot 15 and 16, located in Section 6, Township 12 North, Range 19 West, P.M.M.
3. The property was annexed in 2009 by City Resolution #7483.
4. The subject property has frontage on Gharrett Street and Rufus Road. Gharrett Street is functionally classified as an Urban Collector. Rufus Road is located outside of city limits and is a dead-end road. Under the *Our Missoula 2045 Land Use Plan*, Gharrett Street has a street type of Community Residential, which are “residential corridors that have an important function in the larger transportation network. They may serve popular destinations such as parks, schools, religious assemblies, and recreation areas.” This street type is intended to be similar to Collector and Minor Arterial roadways in the standard street classification system.

5. There are no existing sidewalks along the portions of Gharrett Street or Rufus Road that front the subject property.
6. The subject property is within the Missoula Urban Transportation District, the Utility Services Area Boundary, the Urban Growth Area, and the Air Stagnation Zone.
7. The subject property is within an established service area for Missoula hospitals and the City Fire and Police Departments.

### **Proposed Development**

8. The subject property is approximately 31,929 square feet or 0.733 acres.
9. The subject property contains one existing structure that is used for Religious Assembly (Lighthouse Baptist Church) and approximately 71 parking spaces.
10. The radio tower and associated transmitter shed, vehicle barriers, and fencing are proposed to be located within the southwest corner of the parcel.
11. The radio tower is proposed at approximately 33 feet from the west (side interior) property line and 38.5 feet from the south (side interior) property line.
12. The radio tower is proposed at 80 feet in height with a 4-foot antenna. Title 20, Section 20.110.060.B.1.a states antennas are an exception and not counted in the measurement of building height.
13. No additional buildings or structures are proposed in relation to the radio tower.
14. A future building addition is proposed on the north side of the existing church and will incorporate a gymnasium as part of the church facility. Compliance with the zoning and all other applicable City codes will be determined at the time of building permit submittal.
15. Title 20, Section 20.40.160 applies Use and Building Specific Standards to Wireless Communication Facilities. Section 20.40.160.B.1.d exempts radio towers from this section.

### **Land Use Plan and Zoning**

16. The subject property is zoned R8 Residential. The RR-1 (Title 19) zoning district was applied to the subject parcel at the time of annexation in 2009. R8 (Title 20 comparable district) zoning was applied based on compliance with the land use designation of Residential Medium in the applicable regional plan at that time, the *Our Missoula 2035 Growth Policy*. This designation supports primarily single-family residences, with densities of 3-11 units per acre.
17. The *Our Missoula 2045 Land Use Plan* is the current applicable plan for guiding future growth in Missoula. The Land Use Plan classifies parcels by place types, which “describe the intended physical outcomes for an area, and provide recommendations for future streets, blocks, lots, buildings, land uses, and intensities in relation to future mobility options.”
18. The place type for the subject property is Limited Urban Residential, which covers areas typically on the city outskirts or near development constraints. This place type is primarily intended to offer homeownership opportunities through single-family homes and duplexes in quieter areas with limited transit, while also supporting a moderate variety of housing options. This place type aims to balance residential development with access to local amenities and connections to more urbanized

areas through driving or cycling. Structures in this place type tend to be small to medium-sized residential buildings with some commercial services and public uses. Medium walkability and pedestrian connectivity with longer block lengths, trail connections at the ends of cul-de-sacs, and safe routes to schools.

19. The current relatable Title 20 zoning districts for the Limited Urban Residential place type are R5.4, RT5.4, R8, and RMH. The current zoning complies with the place type designated in the Land Use Plan.
20. Pursuant to Table 20.05-1 "Uses Allowed in Residential Districts" of the Title 20 zoning ordinance, the ground-mounted Wireless Communication Facility use requires conditional use approval to operate in the R8 Residential zoning district.
21. Parcels to the south and east of the subject property are zoned R8 Residential. Parcels to the north of the subject property are unzoned. Parcels to the west of the subject property are outside of City limits and zoned R Residential within Missoula County.
22. Surrounding uses are all single-detached residential houses.
23. In the R8 zoning district, the minimum required parcel area and parcel area per dwelling unit is 8,000 square feet. The required setbacks are 20 feet for the front and rear, 7.5 feet for interior sides, and 10 feet for street side. Maximum building height is 30 or 35 feet, depending on the roof pitch.
24. The new Wireless Communication Facility will be required to meet all Missoula Municipal Code requirements at the time of building permit approval, per the one recommended condition of approval. Section 20.40.160.B.1.d exempts radio towers from Use and Building Specific Standards for Wireless Communication Facilities.

### **Parking and Access**

25. Title 20.60.020, Table 20.60-1 provides the required parking ratio for each use classification. There is no parking requirement for Wireless Communication Facility use.
26. The existing Religious Assembly use requires 41 parking spaces. The application packet includes a proposed building addition for the future proposed gymnasium, which will be required to supply parking that meets the required minimum and will be reviewed for compliance at the time of building permit.
27. No parking spaces are required for the proposed Wireless Communication Facility.
28. Title 20, Table 20.60-2 outlines the bicycle parking requirements for Other uses. There is no bicycle parking requirement for Wireless Communication Facility use.
29. No bicycle parking spaces are required for the proposed Wireless Communication Facility.
30. Vehicle access to the subject property is provided by two driveways on Gharrett Street on the east side of the parcel.
31. There is no pedestrian access to the subject property, as no sidewalks exist along its frontages on Gharrett Street or Rufus Road.

### **Conditional Use Review**

32. Title 20, Section 20.85.070.H outlines criteria for the review of conditional uses, which include whether the proposed use:
  - a. is in the interest of public convenience;
  - b. will not have a significant adverse impact on the neighborhood or community;
  - c. will not impede the orderly development and improvement of surrounding properties for uses permitted in the district;
  - d. has compatible operating characteristics with the surrounding area in terms of hours of operation, outdoor lighting, noise, and traffic generation;
  - e. will not have a significant adverse impact on traffic safety and comfort for motorized and non-motorized modes of transport;
  - f. will be functional and safe in terms of pedestrian, bicycle and vehicular access, parking, loading, and servicing;
  - g. is in accordance with the Growth Policy (Land Use Plan) and other adopted plans;
  - h. the site addresses open space, light, and protection of natural features; and,
  - i. that the use is compatible with adjacent properties in terms of physical elements.
33. Wireless Communication Facility use is required to comply with all applicable Title 20 regulations. Compliance with zoning, engineering, fire and building code will be confirmed prior to building permit approval per the recommended condition of approval. Final design will be reviewed at the time of building permit and must substantially comply with the design in the conditional use application, per the recommended condition of approval.
34. Title 20, Section 20.40.160 applies Use and Building Specific Standards to Wireless Communication Facilities. However, Section 20.40.160.B.1.d exempts radio towers from this section. Therefore, the radio tower is not subject to the development standards schedule of Section 20.40.160.F.3.
35. The proposed Wireless Communication Facility is in the interest of public convenience as it is intended to establish a federally licensed, low-power FM radio station for the local Missoula community, providing educational, religious, and public service programming. The facility's primary purposes include community broadcasting, offering tailored programming and content to Missoula, providing communication capabilities during outages of commercial power or wireless systems, and backup power capabilities. The proposed use would have capabilities to serve majority of users within the City of Missoula. The proposed use is not anticipated to have a significant adverse impact on the neighborhood or community.
36. The proposed facility has been approved by the Federal Communications Commission (FCC) under file number 0000271565. The Low Power FM Broadcast Station Construction Permit demonstrates the proposed facility is legally authorized to operate per the FCC, meets federal technical and safety standards, and will not have inference with other communications services.
37. The proposed Wireless Communication Facility is not anticipated to impede the development and improvement of surrounding properties. The construction of the

proposed ground-mounted structure will not have an adverse effect on the design and development of other structures. The placement in the southwest corner positions the tower as far as possible from existing nearby homes while remaining on the subject property.

38. The applicant proposes a support structure height of 80 feet and antenna height of 4 feet in order to provide clear broadcast coverage to most of the City of Missoula. The height of the radio tower was chosen to maximize broadcasting coverage. The FCC license permits a coverage radius of approximately 3.5 miles in most directions. The center of radiation where the radio signal emits must be clear of any nearby obstructions. Title 20, Section 20.110.060.B.1.a states antennas are an exception and not counted in the measurement of building height.
39. The proposed Wireless Communication Facility has operating characteristics that are compatible with the surrounding area, with no impact related to hours of operations as the facility operates passively. Church members and staff would need to check on the radio tower operation periodically during regular business hours, Monday through Friday.
40. The proposed Wireless Communication Facility has operating characteristics that are compatible with the surrounding area, with no impact from outdoor lighting. The proposed tower height does not require any additional lighting or aviation painting per the Federal Aviation Administration. No additional lighting is proposed as the existing lighting within the church parking lot is sufficient. Any proposed outdoor site lighting is required to comply with all City codes and the Dark Skies Ordinance.
41. The proposed Wireless Communication Facility has operating characteristics that are compatible with the surrounding area, with no increase in noise. No excessive noise is anticipated from the property. A 100-watt transmitter, 5,000 BTU air conditioner, and low-velocity cooling fans will be contained within an equipment enclosure. The air conditioner has a noise level of 55 dBA which is considered relatively quiet, quieter than a typical conversation and generally inaudible at a short distance outdoors.
42. The proposed Wireless Communication Facility has operating characteristics that are compatible with the surrounding residential area. The proposed use would not generate additional traffic to or from the property as the facility operates passively and requires no additional staff. The proposed use would function without creating any new vehicular activity.
43. The proposed Wireless Communication Facility will not have a significant adverse impact on traffic safety or comfort and will be functional and safe in terms of pedestrian, bicycle and vehicle access, parking, loading and servicing. Vehicle barriers would be installed to protect the radio tower from potential collisions within the church parking lot. A 6-foot chain link fence is proposed to be installed around the tower and equipment shelter to prevent unauthorized access and the equipment shelter will be securely locked as an additional safety measure. The radio tower would be located in the southwest corner of the parcel, placing it the furthest possible distance from Gharrett Street and Rufus Road.
44. Review for compliance with the growth policy occurred at the time of annexation. The RR-1 Residential zoning district applied at the time of annexation and the later R8 Title 20 comparable district was determined to be relatable to the Residential Medium land use designation of the *Our Missoula 2035 City Growth Policy*. The R8

Residential zoning district is also a comparable district for the Limited Urban Residential place type designated in the *Our Missoula 2045 Land Use Plan*. The proposed use, scale, and intensity of the Wireless Communication Facility will fit within the intent of the designated place type.

45. The proposed Wireless Communication Facility is in accordance with the Growth Policy (Land Use Plan) as the use is a low-impact, low intensity use that does not generate traffic, noise, or emissions which aligns with the residential character of the Limited Urban Residential place type. The radio tower has a minimal structural footprint and limited operational characteristics and therefore can be accommodated within the medium to large setbacks of the place type. The Limited Urban Residential place type includes neighborhoods that are near environmental or topological constraints or hazards that influence how these areas can develop and grow. The parcels surrounding the subject property contain areas with unbuildable slopes where other types of development would be limited. Locating a radio tower in this location would avoid placement in denser developed cores. The radio tower can provide community benefits, such as broadcasting educational programming and emergency information, while remaining compatible with the moderate-density, single family residential area.
46. The proposed Wireless Communication Facility will properly address open space, light, and protection of natural features. The construction and installation of the radio tower will not affect existing natural features or existing landscaping on the subject property. The radio tower would be located in the southwest corner of the parcel, maintaining adequate distances from property lines and rights-of-way. The facility has a minimal structural footprint and limited operational characteristics, ensuring that it does not diminish usable outdoor space. No additional lighting is proposed for the facility and therefore it will not generate any light pollution or glare impacting adjacent properties.
47. The proposed Wireless Communication Facility is compatible with adjacent properties and uses in terms of physical elements such as open space design, screening and buffering, and any applicable use-specific standards. Title 20, Section 20.40.160 applies Use and Building Specific Standards to Wireless Communication Facilities. However, Section 20.40.160.B.1.d exempts radio towers from this section. Therefore, the proposed ground-mounted radio tower is not subject to the development standards schedule of Section 20.40.160.F.3, including structure height, antenna height, setbacks, or landscaping buffering and screening.
48. The proposed Wireless Communication Facility will comply with all applicable Title 20 standards per the recommended condition of approval.
49. There is no signage associated with the proposed use. Any proposed signage will be required to meet all applicable standards as outlined in Title 20, Chapter 20.75 and will be reviewed at the time of sign permit submittal.

### **Conclusions of Law**

#### **1. Is in the interest of the public convenience and will not have a significant adverse impact on the neighborhood or community;**

- a. The proposed use's primary purposes will include community broadcasting, offering tailored programming and content to Missoula, providing communication capabilities during outages of commercial power or wireless systems, and backup power capabilities.

- b. The proposed use will be able to broadcast to the majority of the City of Missoula, with a Federal Communications Commission licensed coverage radius of approximately 3.5 miles in most directions, which will increase public convenience.
- c. The proposed use will be strategically located in the southwest corner of the subject property, maintaining adequate distances from property lines and rights-of-way.
- d. The Federal Communications Commission confirms that the facility complies with federal technical and safety standards.
- e. The proposed use will be in an area that is already served by City Police and City Fire.
- f. The proposed use in this location will not compromise public convenience or the general welfare of the neighborhood or community.

**2. Will not impede the orderly development and improvement of the surrounding properties for uses permitted in the district;**

- a. The construction of the proposed ground-mounted structure will not have an adverse effect on the design, scale, or development of other structures in the area.
- b. The proposed use will not impede the orderly development and improvement of the surrounding properties for uses permitted in the district.

**3. Has operating characteristics that are compatible with the surrounding area in terms of hours of operation, outdoor lighting, noise, and traffic generation;**

- a. The proposed use will operate with no impact related to hours of operation. Church staff will periodically check on the facility during regular business hours.
- b. The proposed use will not require or need additional outdoor lighting. Existing lighting on site is sufficient.
- c. The proposed use will not generate excessive noise. Any noise generated by the use will be required to conform with the regulations for a residential zone, as established in the Missoula Municipal Code, Chapter 9.30.040.
- d. The proposed use will not generate additional traffic to or from the property as the facility operates passively and requires no additional staff.
- e. The proposed use will have operating characteristics that are compatible with the surrounding area in terms of hours of operation, outdoor lighting, noise, and traffic generation.

**4. Will not have a significant adverse impact on traffic safety or comfort, including all modes of transport (non-motorized and motorized), and will be functional and safe in terms of pedestrian, bicycle and vehicular access, parking, loading and servicing;**

- a. The proposed use will not generate additional traffic to or from the property as the facility operates passively and requires no additional staff.

- b. Vehicle barriers will be installed to protect the radio tower from potential collisions within the church parking lot.
- c. A 6-foot chain link fence will be installed around the tower and equipment shelter to prevent unauthorized access and the equipment shelter will be securely locked as an additional safety measure.
- d. The radio tower will be located in the southwest corner of the parcel, placing it the furthest possible distance from Gharrett Street and Rufus Road.
- e. The proposed use will not have a significant adverse impact on traffic safety or comfort, including all modes of transport, and will be functional and safe in terms of pedestrian, bicycle, and vehicular access, parking, loading, and servicing.

**5. Is in accordance with the Growth Policy (Land Use Plan) and other relevant adopted plans;**

- a. The *Our Missoula 2045 Land Use Plan* is the current applicable plan for guiding future growth in Missoula. The Land Use Plan classifies parcels by place types, which “describe the intended physical outcomes for an area, and provide recommendations for future streets, blocks, lots, buildings, land uses, and intensities in relation to future mobility options.” The place type for the subject property is Limited Urban Residential, which covers areas typically on the city outskirts or near development constraints. This place type is primarily intended to offer homeownership opportunities through single-family homes and duplexes in quieter areas with limited transit. The current relatable Title 20 zoning districts for the Limited Urban Residential place type are R5.4, RT5.4, R8, and RM. The current zoning complies with the place type designated in the Land Use Plan.
- b. The proposed Wireless Communication Facility use is in accordance with the Growth Policy (Land Use Plan).

**6. That the site properly addresses open space, light, and protection of natural features;**

- a. The construction and installation of the radio tower will not affect existing natural features or existing landscaping on the subject property.
- b. The proposed radio tower will be located in the southwest corner of the parcel, maintaining adequate distances from property lines and rights-of-way.
- c. The facility has a minimal structural footprint and limited operational characteristics, ensuring that it does not diminish usable outdoor space.
- d. No additional lighting is proposed for the facility and therefore it will not generate any light pollution or glare impacting adjacent properties.
- e. There are no significant natural features on or near the subject property.
- f. The site properly addresses open space, light, and protection of natural features.

**7. That uses are compatible with adjacent properties and uses in terms of physical elements such as open space design, screening and buffering, any**

**applicable use-specific standards and any other elements considered important by the City Council.**

- a. The proposed use is a low-impact, low intensity use that does not generate traffic, noise, or emissions which aligns with the residential character of the Limited Urban Residential place type.
- b. The proposed radio tower has a minimal structural footprint and limited operational characteristics and therefore can be accommodated within the medium to large setbacks of the place type.
- c. The Limited Urban Residential place type includes neighborhoods that are near environmental or topological constraints or hazards that influence how these areas can develop and grow. The parcels surrounding the subject property contain unbuildable sloped areas where other types of development would be limited. Locating a radio tower in this location would avoid placement in denser developed cores.
- d. The proposed Wireless Communication Facility will comply with all applicable Title 20 standards per the recommended condition of approval.
- e. The proposed use is compatible with adjacent properties and uses in terms of physical elements such as open space design, screening and buffering, and the use-specific standards.

## **VIII. COMMENTS FROM RELEVANT AGENCIES**

**City Public Works and Mobility – Utilities:** “No comments from me.” – Andy Schultz

**City Public Works and Mobility – Transportation:** “No comments from Transportation at this time. I don’t see any potential impacts on transportation facilities.” – Aaron Wilson

**Missoula Redevelopment Agency:** “MRA has no comment.” – Ellen Buchanan

**Montana Department of Transportation:** “Thank you for reaching out to us regarding this request. The structure is outside MDT’s right of way, and it does not affect any of our projects.” – Aldo Videa

**Fire Department:** “Fire has no comments or concerns about the proposed conditional use request at 5425 Gharrett Street.” – Adam Sebastian

**Office of Emergency Management:** “I have confirmed with our Communications Coordinator, Emergency Management has no concerns.” – Adriane Beck

**No comment was received at the time of this report from the following agencies:**

**Montana Department of Revenue:** No comment received.

**Police Department:** No comment received.

**Missoula City-County Health Department:** No comment received.

**Parks and Recreation:** No comment received.

**City Attorney:** No comment received.

**Missoula Urban Transportation District:** No comment received.

**City Public Works and Mobility – Engineering:** No comment received.

**Wastewater Treatment Plant:** No comment received.

**Neighborhood Council:** No comment received.

## **IX. ATTACHMENTS**

- A. Application Packet
- B. Public Comment

**X. EXHIBIT A: LEGAL MAP**

