



January 12, 2026

Dear Mayor Davis, Missoula City Council and CPDI staff,

As the Our Missoula Code Reform process enters its final stretch, we want to thank you for the extraordinary amount of work that has gone into modernizing Missoula's land-use framework. Building on the Land Use Plan adopted last year, the City now has a once-in-a-generation opportunity to take bold steps toward our shared goals for a more affordable, sustainable, and equitable Missoula.

City staff have done admirable work shaping the Unified Development Code and responding to public feedback. We offer the amendments below in the same spirit: to ensure the final code delivers timely and meaningful increases in housing supply, mitigates sprawl and displacement, and supports compact, walkable neighborhoods where people can live, work, shop, and thrive.

Staff-Recommended Amendments We Ask Council to Reject:

While most staff-recommended amendments are improvements to the draft code, we respectfully urge Council **not** to adopt the following:

1. Staff Amendment #3, including Neighborhood Commercial in Floor Area Ratio (FAR) calculations. Keep it as it is in the draft.

Including commercial building area in the residential FAR calculation limits the ability to build one of Missoula's most time-tested building types: a small family-owned shop with a home above. These mixed-use buildings are key to neighborhood vitality and should be encouraged, not discouraged.

2. Staff Amendment #6, amending Floor Area Ratios.

The floor area ratio recommended in the first draft of the UDC was adequate for Missoula's urgent housing needs. We do not agree with lowering FAR to 1.2, which would limit building infill homes in existing neighborhoods.

3. Staff Amendment #20, including Neighborhood Commercial uses in FAR and modifying size limits.

Neighborhood Commercial building area should not count towards the Floor Area Ratio limit. Lowering the maximum square footage in urban residential districts to 3,500 square feet while allowing it at 5,000 square feet in limited urban or rural residential districts reverses the logic that a location with a higher population nearby would see more visitors and therefore want more space.

a. Alternate proposal: Size limit for Neighborhood Commercial should be increased in all districts to 5,000 square feet.

This proposal was passed by the Planning Board..

Our Proposed Code Amendments

1. Allow Neighborhood Commercial in the middle of blocks.

Missoula residents have expressed strong desire for more neighborhood stores

and shops near their residences. This would unlock more potential opportunities for entrepreneurship, encourage walkability and access, and give business owners the flexibility to modify or upgrade their space.

This proposal was passed by the Planning Board.

2. Eliminate wasteful parking mandates for commercial buildings.

This would give small businesses the flexibility to do more with their space and encourage economic growth.

This proposal was passed by the Planning Board.

3. Increase height limits in Urban Residential 3 (U-R3) by 10 feet and in Urban Residential 4 (U-R4) by 5 feet.

This brings the code into compliance with the maximum heights described by the Land Use Plan, which was adopted unanimously last year. Functionally, it adds the potential of one additional story above the building heights allowed by the current code, which is an appropriate and incremental change. Allowing 4-story buildings improves accessibility since elevators begin to pencil out at 4 stories, allowing each floor to be ADA-accessible.

This proposal was passed by the Planning Board.

4. Fold Civic District 1 into Civic District 2.

In the interest of further simplifying the code, we think the Civic District 2 designation would be appropriate for areas that are designated Civic District 1 in the draft. Since Civic District 1 precludes housing being built, this would increase the area of the city eligible for housing. Zoning is not the best tool for restricting housing at unsuitable sites and we prefer the flexibility allowed in Civic District 2.

This proposal was passed by the Planning Board.

5. Reduce landscaping percentage requirements by 5 percentage points and lift the requirement in the Downtown Transition.

Additional space requirements on housing increase costs for residents and limit the ability to build on compact lots. The biggest positive environmental impact Missoula can make is by encouraging efficient, compact development. If residents are able to access alternate modes of transportation, their greenhouse gas emissions are reduced. If Missoula incentivizes compact building of homes in existing city areas, further sprawl and damage to green space and critical habitat is reduced. Suburban landscaping is not the best fit for the urban area of the Downtown Transition zone.

This is a more limited proposal than Planning Board's Motion #25.

6. Remove activity area requirements.

Like landscaping requirements above, mandating the construction of private activity areas adds cost and space requirements to the compact, low-cost infill homes that Missoula needs. We believe the activity area requirements as drafted would result in infill projects that have been built no longer being viable in the future. If a project can be built, activity areas would decrease the space that could be a home.

The Planning Board recommended paring down activity area requirements.



Zoning Map Amendments:

1. **Change the zoning designation for corridors served by frequent transit from Urban Residential 3 to Urban Residential 4. The corridors are Johnson Street from Third to North; Catlin Street from Third to 14th Street; Arthur Avenue from Evans to South; and South Avenue from Higgins to Arthur.**

Increasing housing options near frequent transit meets the City's goals to increase overall housing capacity especially near transit corridors.

This proposal was passed by the Planning Board.

2. **Change Urban Residential 1 (U-R1) zoning for the areas east of Paxson, north of 39th Street / Southwest Higgins, west of Lester Street and south of Benton Avenue to Urban Residential 2 (U-R2).**

Slightly increasing the flexibility for home types in these neighborhoods, which are well served by amenities and transit, reflects the community's desire for equitable development in neighborhoods across town. This change would decrease the creation of nonconforming buildings in these areas.

Public Support for These Changes:

In collaboration with Front Step Community Land Trust, we fielded a scientific [public opinion survey](#) in mid-November which showed broad agreement with key aspects of the UDC.

- Nearly half (47%) of residents have been personally affected by the housing shortage, and another 38% know a friend or family member who has been impacted.
- Nearly six in ten Missoulians (58%) report that this lack of affordable homes has made it difficult to imagine a long-term future for themselves in our community.
- **Two-thirds (66%) of voters including a majority of homeowners (54%) believe the city should prioritize creating more homes to reduce costs**, while one-third (34%) prefer the city try to protect neighborhoods from change.
- **Voters favor giving businesses near downtown flexibility to set their own parking needs (66% in support).**
- **Respondents support permitting small neighborhood businesses on mid-block sites (64%)** as well as corner lots.
- After an extensive three-year process, nearly two-thirds (63%) of voters think the UDC has been reviewed long enough and should be brought to a vote, compared to the 37% who prefer additional time and review.
- You can view the details and methodology [here](#).

We are grateful for your dedication to this work. **Thank you for your commitment to a more inclusive and vibrant Missoula.**

Sincerely,
ProHousing Missoula