

Memorandum: Planning Commission Public Hearing Summary

January 5th, 2025

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Overview

The Planning Commission held a public hearing for the proposed amendments to the *Our Missoula 2045 Land Use Plan*, the new Unified Development Code (UDC), and the new zoning map beginning on November 18th, 2025. The public hearing continued on November 20th, December 2nd, December 4th, and December 9th, 2025.

During these hearings, the Planning Commission heard presentations from staff and comments from the public. The Planning Commission took both the verbal public comments and comments submitted virtually into consideration when deliberating on the three items. All virtual public comments received prior to and during the Planning Commission public hearing are attached to the project record.

See the recordings and minutes for each public hearing meeting for the meeting details, discussion, and public comment:

- [November 18th Public Hearing](#)
- [November 20th Public Hearing](#)
- [December 2nd Public Hearing](#)
- [December 4th Public Hearing](#)
- [December 9th Public Hearing](#)

Planning Commission Recommendation

Adoption Motions

At the public hearing on December 9th, 2025, the Planning Commission voted to recommend that the Missoula City Council **adopt** the amendments to the *Our Missoula 2025 Land Use Plan*, the new Unified Development Code (UDC), and the new Zoning Map. Below are the complete motions that were passed by the Planning Commission:

1. Motion that the Planning Commission resolves to recommend that the City Council adopt amendments to the *Our Missoula 2045 Land Use Plan* and *Place Types Map* (Attachment 1), based on the information and considerations in the staff report and the recommended amendments of the Planning Commission.
2. Motion that the Planning Commission recommends the City Council adopt an ordinance establishing Title 22 - City of Missoula Unified Development Code (UDC)

(Attachment A), repealing in its entirety Title 16 – Manufactured Housing and Mobile Home Parks; Title 17 – Subdivisions; Title 20 - Missoula City Zoning Ordinance; Title 21 – Form Based Code (Sx^wtpqyen); and any Planned Unit Development (PUD) or Special District (SD) found in Attachment C – Planned Unit Development (PUD) and Special Districts (SD) Repealed/Retained – as well as any PUD or SD not listed as Converted to Historic Resource Overlay; with all of the foregoing based on the findings of facts and conclusions outlined in the staff report and the recommended amendments of the Planning Commission.

3. Motion that the Planning Commission recommends the City Council adopt an ordinance establishing a new City of Missoula Zoning Map (Attachment B), and repeal the existing Zoning map, to come into compliance with the Montana Land Use and Planning Act, MCA 76-25, based on the findings of facts and conclusions outlined in the staff report and the recommended amendments of the Planning Commission.

Planning Commission Recommended Amendments

The following section describes the motions initiated by the Planning Commission with recommended amendments to the Land Use Plan, Unified Development Code, and Zoning Map. The motions listed include only those that were passed by the Planning Commission. Some amendments include specific directions, while others include general guidance for City Staff or City Council to explore changes to certain areas of the code or map. The Staff Responses include additional considerations and recommendations in relation to each amendment.

Overall Amendments

1. Motion to approve staff-recommended amendments as presented.

Staff Response:

The referenced staff recommended amendments dated December 2nd are incorporated into The *Updated Staff Recommended Amendments* Memo, dated January 5th, 2025 (attached to the project record). Minor modifications were made to a few of these previous amendments, but the context and intent remain the same.

Land Use Plan/Place Type Map

2. Motion to change the land-use place type designation for the parcel formerly described as the Aspire Subdivision in East Missoula from Urban Residential High to Limited Urban Residential.

Staff Response:

Staff do not recommend changing the Place Type for the property known as the Aspire Subdivision. The current Urban Residential High designation aligns with the Land Use Plan's adopted framework and the methodology used to map East Missoula, ensuring consistency across neighborhoods and Place Types. Changing the Place Type now would create a mismatch with surrounding areas, reduce the integrity of the adopted Plan, and could set a precedent for revising Place Types after development approvals.

The Urban Residential High designation also supports incremental development over time, allowing infrastructure improvements to keep pace with build-out. Staff recommends retaining the current Place Type to maintain consistency, predictability, and alignment with the adopted Land Use Plan.

Zoning Map/Districts

3. Motion to change the zoning map designation for the Aspire Subdivision parcel from Urban Residential 3 (U-R3) to Limited Urban Residential 2 (LU-R2).

Staff Response:

Staff does not recommend changing the zoning for the property known as the Aspire Subdivision. The current U-R3 zoning aligns with the adopted Urban Residential High Place Type and the methodology used to map East Missoula. Changing the zoning to LU-R2 would create inconsistency with the Land Use Plan's framework, reduce consistency across the neighborhood, and could undermine the adopted framework.

U-R3 zoning also ensures that any development will be reviewed under existing infrastructure and subdivision standards, preventing full-density build-out without adequate streets, water, sewer, and traffic capacity. Staff recommends retaining U-R3

zoning to preserve alignment with the Place Type, maintain policy consistency, and ensure future development occurs in a planned, incremental manner.

4. Motion to consolidate Civic District 1 (CD-1) into Civic District 2 (CD-2)

Staff Response:

Staff do not recommend collapsing the two Civic District zones into one Civic District. Consolidating CD-1 into CD-2 overly broadens the mapping methodology and assessment of considerations and reduces context-specific flexibility envisioned by the Land Use Plan.

The Land Use Plan provides a description of Civic Place Types overall, as well as the rationale for the Civic District zoning. Civic Place Types are intended for public or institutional uses; not primarily residential. The Land Use Plan supports nuanced, site-specific zoning within civic areas. The Civic Place Type description includes a statement to help guide the distinction between a range of implementation actions through zoning districts based on context and adjacent land use types. The Civic Place Type states that residential and/or commercial development may be permitted, dependent on context and adjacent land use types. Residential uses are conditionally allowed based on context and adjacency, not guaranteed. Areas within the Civic Place Type vary by context and relationship to adjacent land use types. Staff determined that two districts were needed by assessing the Civic Place Type areas for amenities, environment and historic context, geographic location and existing land use.

A primary distinction between the two Civic zoning districts is whether residential is permitted or not. Residential use relies much more heavily on access to amenities, proximity to infrastructure, compact and connected street grids that support walkability, and sense of neighborhood. They are the places where people spend most of their time.

Just by evaluating a few different sites within the Civic Place Type, we can determine why residential use would not be appropriate in some areas and it may be appropriate in others. The Civic Place Type includes land such as a cemetery, a wastewater treatment facility, the fairgrounds, university campus, university owned property, and Fort Missoula. Some of the areas within the Civic Place Type are closer to established neighborhoods with compact and connected grids to support walkability. Other Civic Place Type areas have environmental constraints or are isolated from adjacent land use by major corridors and distance. The area that staff clearly identified as supportive of residential use within the Civic District 2 (CD-2) is generally associated with the University campus and university

owned lands nestled within, or on the edge of, a compact grid. Civic District 1 (CD-1) was identified for places like the Cemetery, Wastewater Treatment Facility, Fairgrounds, Fort Missoula and some School District parcels for multiple reasons including incompatibility with existing and adjacent land uses, and incompatibility with the historic context.

The Land Use Plan promotes Six Key Policy Themes with Housing Choice and Access one of the six themes. The Land Use Plan promotes striking a balance between the policy objectives of each theme, especially related to consideration of place, appropriate location of uses, and increasing residential development opportunities into areas that can support it. The Land Use Plan assessed the needed residential capacity to accommodate growth within the next 20 years through the capacity that would be available with the place types and subsequent zoning, without the need for residential in every area of the community. The Plan also elevates the value of place and identity, which the Fort Missoula historic district is certainly a symbol of.

Public comment was received during the Land Use Plan process and the UDC process in favor of, and opposed to, residential housing in Civic Districts, especially as it pertains to Fort Missoula. Justification for collapsing the two Civic Districts into one district centered almost solely around the need for housing, yet the Plan stresses the need to consider housing with a balanced approach to other values of the community represented in the other five Key Policy Themes. During the Land Use Plan process, there were more commenters opposed to allowing residential housing in all Civic districts. More recently, comments have been received from two property owners within the Fort Missoula area with opposing views on how the area should be zoned – one in support of residential use and the other opposed to residential use. More comments against allowing residential use within Fort Missoula rather than comments in favor, were also received while development was recently proposed at Fort Missoula.

One of the justifications from commenters in support of residential at Fort Missoula (and the potential change to collapse CD-1 into CD-2) was because residential had been there previously. While officers were stationed in barracks that were a part of the Fort, the housing of officers in barracks was accessory to the primary use of the Fort as a military base. In addition to the Fort's function as a military base and training ground, the Fort eventually became an internment camp, and finally a place for community gathering, storytelling, exhibition, recreation, and work. The areas' most recent uses are consistent with the Civic Place Type and CD-1 zoning district.

Analyses show that the CD-1 area of the Fort Missoula Historic District is not proximal to appropriate services and amenities and is isolated from compatible adjacent uses like residential areas. The area is also adjacent to sensitive lands that can be impacted by intensive new development. Fort Missoula is a significant historic resource that, through the CD-1 zoning, balances opportunities for economic revitalization and adaptive reuse with consideration of the historic and environmental resources in the area.

There are some uses that are prohibited in the CD-1 zoning district and are also simply not compatible or appropriate with the historic nature of the Fort Missoula area. Incompatible development within the Fort area can threaten the historic district national register listing. Not all of Fort Missoula's history is a positive note in Missoula's history. It is also tied to period of internment, where there is a lot of complicated layers of history. It is important to make sure that the permitted uses are respectful of that while also maintaining the character of the Fort and protecting the history of the area.

For these reasons, staff recommends retaining the two Civic Districts as mapped in the proposed zoning map and with the uses as shown in the Use Table.

5. Motion to request that staff and City Council holistically re-evaluate the place type and zoning for the area zoned Transitional Mixed Use (T-MU) in the River Road neighborhood so that the residential component of this area is highlighted and maintained.

Staff Response:

Staff have holistically evaluated the place type and zoning for the T-MU zoned area in the River Road neighborhood and do not recommend any changes. This area of River Road neighborhood falls under the Urban Mixed-Use Low/High Place Types. These Place Types support a mix of residential, commercial, and low-intensity industrial. Therefore, residential is one of the priorities for the area, and does not lead to any needed place type changes to maintain or highlight residential uses. T-MU is considered a comparable zoning district for those place types.

The Transitional Mixed-Use district is intended to accommodate an extensive mix of uses including residential, commercial, and low-intensity industrial. This district is generally applied where the existing block pattern, including large lots and a disconnected street grid, are not easily converted to an urban development pattern that would be supportive of applying an urban mixed-use zoning district, but there is potential to evolve towards an urban mixed-use context in the future.

Staff determined that T-MU is appropriate for the area within the River Road neighborhood due to its disconnected street grid, existing larger lots, and consideration of existing uses. The existing pattern makes it difficult to convert development to an urban development pattern more suited to the urban mixed-use zones (that are also considered comparable to the Place Types). For that reason, staff is not recommending any zoning map changes for this area.

6. Motion to direct staff to work with Missoula County Public Schools (MCPS) on potential text or map amendments to ensure maximum flexibility for redevelopment of underutilized MCPS properties (Rimel Rd., Prescott School, Admin Building).

Staff Response:

Staff have assessed the comments received from MCPS related to three properties that they own and do not recommend any changes to the Land Use Plan or zoning (text or map). Staff have also been communicating with MCPS to share our recommendation for no change.

The three parcels in question are highlighted in the comment letter dated December 1, 2025, and are the Administration Building located at 215 S. 6th Street is currently proposed with UR-3 zoning, Prescott School located at 1100 Harrison Street is currently proposed with UR-2 zoning, and the Rimel Road property (undeveloped) is currently proposed with OP-2 zoning. The concern from the MCPS for the Administration Building and Prescott School is that there is flexibility for redevelopment with specific mention of adaptive reuse. UR-2 and UR-3 zoning provides a range of building types from one-unit house to apartment buildings and neighborhood commercial uses, using the standards set in Article 4.2 to guide development. Conversion of legally established existing buildings containing non-residential uses (like the Administration Building and Prescott School) are also supported in the UDC with flexibility for the approach to establishing residential uses, as demonstrated in the Updated Staff Recommended Amendments memo, amendment #2. Overall, whether it be new construction or conversion of existing buildings, flexibility is in place for redevelopment at these two sites that is consistent with the Land Use Plan.

The Rimel Road property has an Open and Resource Place Type and is recommended for OP-2 as comparable zoning. OP-2 permits very low-density residential use at 40 acres per unit and an allowance of two units per parcel by right. It also encourages cluster development. Currently, the parcel is remote from city utilities. The designation and

relatable zoning as proposed by staff are appropriate until additional services are addressed. The Place Type designation and recommended zoning can be revisited in future updates.

7. Motion to direct staff to review and smooth zoning district boundaries—particularly where boundaries split lots or create abrupt transitions—to better align with street types, development patterns, and consistent streetscapes, without reopening the Land Use Map itself.

Staff Response:

Staff reviewed the zoning map for irregular zoning patterns that may be inconsistent with the rest of the surrounding blocks and neighborhood. Staff have included recommend amendments to the zoning map in an effort to “smooth” zoning district boundaries for City Council’s consideration that can be found in the *Staff Recommended Zoning Map Amendments after Planning Board* document.

Staff is recommending that there be an even distribution of higher intensity districts and lower intensity districts within each neighborhood. For example, if we are “smoothing out” an area and change a portion of it from a high intensity district to a lower intensity district, staff looked for opportunities to amend a similar amount of land from a low intensity zoning district to a high intensity district within the same area. The goal of these map changes is to redistribute where higher and lower intensity districts are in a way that is consistent and reflects the levels allowed within each Place Type.

8. Motion to direct staff to revisit and review the zoning map in general looking at boundary lines along alleys vs. the center along the block or street, to try to smooth them out and ensure that there are consistent types and development patterns.

Staff Response:

Staff reviewed the zoning map for irregular zoning patterns that may be inconsistent with the rest of the surrounding blocks and neighborhood. There are amendments that staff are recommending to City Council regarding this subject. Splitting zoning districts along alleys vs Road Centerlines has been looked at on a case-by-case basis. It was determined that the only change necessary to promote consistency on a street scape basis is Staff Recommended Map Amendment #13 to promote transition between D-T zoning and U-R3 zoning on the Westside.

Staff considered the inconsistency of the direction of alleys in relation to the corridors proposed to be U-R4 in the City. For instance, Stephens Ave. has alleys that follow the north to south direction so this change can be accommodated there. However, many other U-R4 corridors do not; some examples include Arthur Ave. and South Higgins. This would require splitting blocks along parcel lines, which is not recommended due to the potential for developers to buy adjacent lots with different zoning. These areas would potentially hold a disproportionate amount of high intensity zoning due to their roadway/alley configuration.

9. Motion to amend the zoning map by changing parcels directly bordering the following corridors from UR3 to UR4 (With parcel-level boundaries to be finalized by staff):

- 1. Johnson Street – from Third Street to North Avenue**
- 2. Catlin Street – from Third Street West to 14th Street West**
- 3. Arthur Avenue – from Evans Avenue to South Avenue**
- 4. South Avenue East – from Higgins to Arthur**

Staff Response:

Staff do not support the proposed amendments to the zoning map. Increased zoning intensity along all frequent transit routes was explored during staff review of the zoning map before public review. This approach appeared to target development within the Franklin to the Fort neighborhood, which is highlighted in the Equity in Land Use report as an area that is vulnerable to gentrification and displacement. Using this method also significantly raises the extent of the U-R4 zoning district in the Westside neighborhood. For this reason, staff are not recommending using high frequency transit routes as the sole source for determining where U-R4 is mapped within the city.

If this motion is adopted, staff's recommendation is to be consistent with all areas accessed by high frequency transit throughout the city. This would add additional U-R4 corridors in the Westside neighborhood along Philips Street.

Chapter 1: Introduction - Article 1.1 Introductory Provisions

10. Motion to recommend that City Council amend Article 1.1.01(B) to extend the code’s transition date from 60 days → 120 days.

Staff Response:

Staff support this motion. See Amendment #1 in the Updated Staff Recommended Amendments memo.

Chapter 4: Zoning – Article 4.2 Residential Districts

11. Motion to adopt an alternative Floor Area Ratio (FAR) and density table as proposed by Shane Morrissey:

Table 4.2.03-3 FAR and Density

FAR & Density	RURAL	LIMITED URBAN		URBAN			
	R-R1	LU-R1	LU-R2	U-R1	U-R2	U-R3	U-R4
Maximum FAR	Number of Dwelling Units						
.5	-	1-2	1-2	1	1	1	1
.6	-	3+	3	2	2	2	2
.8	-	-	4+	3	3-5	3 1-2	3
.9	-	-	-	4+	6+	4-6	-
1.0	-	-	-	-	-	7+ 3+	1-2, 4-6
2.0 1.2	-	-	-	-	-	-	3+ 7+
Density							
Maximum Density (Any parcel is permitted two dwelling units by right, regardless of parcel area)	1 du / 15,000 sf	1 du / 3,500 sf	1 du / 2,600 sf	1 du / 2100 sf	1 du / 1500 sf	1 du / 900 sf	1 du / 600 sf

`+' indicates `or more'.

Staff Response:

Staff support the amendment to the maximum floor-area ratio in U-R4 from 2 to 1.2. Staff reviewed calculations for this maximum and agree it better complies with the densities recommended for the Urban Residential High Place Type in the Land Use Plan.

Staff do not support the other amendments to floor-area-ratio in the table recommended by Planning Commission and have proposed alternative amendments in Amendment #6 of the *Updated Staff Recommended Amendments Memo*.

Staff do not recommend adding traditional density caps to Urban Residential districts. The Land Use Plan indicates that zoning should focus regulations more on form compatibility rather than just density and use (Action Item #6 in the Land Use Plan). Floor Area Ratio is a more flexible tool than traditional density caps and ensures the form of buildings is appropriate for the neighborhood without creating rigid restrictions on number of units. Adding density caps to the Urban Residential zones could also conflict with housing goals.

12. Motion to amend section 4.2.03(D)(4) to strike “indoor activity areas within principal buildings” from the list of floor area ratio (FAR) exemptions.

Staff Response:

Staff do not support striking indoor activity areas within principal buildings from the list of FAR exemptions because it would undercut a tool that helps deliver amenity rich infill development without materially improving compatibility. Removing this exemption would primarily function as a penalty on indoor amenity space by reducing the buildable area available for dwelling units and pushing projects to choose outdoor activity areas rather than providing flexible, year-round options that work in all seasons, when that option best serves the development.

13. Motion to add 10 feet to the height maximums in the U-R3 district, and 5’ to the height maximum in the U-R4 district.

Staff Response:

Staff do not support increasing the maximum height in U-R3 to 45’ (10’ increase) and U-R4 to 50’ (5’ increase). The Public Review Draft of the UDC indicated maximum height for U-R3 at 40’ and U-R4 at 50’. Through public feedback and further analysis, staff lowered the maximum heights in those two districts to the levels found in the Adoption Draft (U-R3 at 35’ and U-R4 at 45’) and provided a rationale in Appendix G1 – Summary of Adoption Draft

Updates. Part of that rationale was related to the concern that a 50' height maximum in U-R4 would incentivize five story, flat roof development that would be less in character with surrounding structures. This change would revert to the public review draft approach for U-R4 and staff concern with that height remains.

The Land Use Plan for the Urban Residential High Place Type recommends that the building scale be compatible with existing houses and buildings and states smaller units are encouraged for developments at higher intensities. The Land Use Plan states this will be achieved through limits on overall building height, floor area, depth or width. The Land Use Plan also states that adaptive reuse of existing structures is preferred.

The U-R3 districts make up a majority of residential areas and include a range of street types that may be narrow and even one-way. Increasing height may eliminate street trees and on-street parking on narrow streets in order to accommodate fire apparatus to serve those locations. Retaining the maximum height for U-R3 at 35' addresses that concern and helps to address concerns over compatible development as stated in Appendix G1 – Summary of Adoption Draft Updates.

14. Motion to remove the limit on the number of dwelling units per building for adaptive reuse projects and update any associated language throughout the UDC. Allow as many units as can fit within the existing structure; new construction still subject to FAR.

Staff Response:

Staff support removing the limit on the number of dwelling units per building for true building conversions because it enables existing structures to be repurposed into housing—often one of the fastest, most cost-effective ways to add homes—without introducing new building bulk or scale impacts in established neighborhoods.

Since the building envelope is already in place, exempting conversions from unit-per-building limits (and associated FAR constraints, where applicable) does not create the same neighborhood-context concerns as new construction; instead, it allows the interior of an existing structure to be used more efficiently to meet housing needs. New construction would remain subject to FAR and applicable form standards, ensuring overall scale remains calibrated.

See Amendment #2 in the *Updated Staff Recommended Amendments* Memo for the proposed amendment language.

Chapter 4: Zoning – Article 4.3 Mixed-Use District Standards

15. Motion that staff evaluate the Urban Mixed-Use zones and identify what is ready to build-to or not, break them apart, and refine what areas are ready to build to. Request that staff look at specific use types that are not applicable for build-to, transparency, and entrance requirements, and exempt them. Look at existing right-of-way and identify how to protect rights-of-way and figure out ways to plan for them into the future.

Staff Response:

The Land Use Plan incorporates flexibility for development in mixed-use districts through the use of build-to-zones and build-to-widths beyond traditional setbacks. This approach helps create a relationship between the building form/placement and the street and adjacent transportation patterns.

Planning Commission raised concerns about the build-to zones and build-to widths when considering building placement in relation to future right-of-way improvements and lot conditions.

Staff evaluated the Urban Mixed-Use requirements and relationship to right-of-way conditions and determined that the preferred approach to addressing concerns over building placement and future planned right-of-way is by incorporating an exception to be considered by Planning Administrator and City Engineer for the build to zone requirement for certain conditions. This is a comprehensive way to address the issues raised by the Planning Commission. See Amendment #12, in the *Updated Staff Recommended Amendments* Memo for staff's proposed amendment language

Staff do not recommend making any changes to the uses subject to the build-to, transparency, and entrance requirements in Urban Mixed-Use districts based on this motion. It is staffs' opinion that the types of uses permitted in the Mixed-Use zoning districts generally have sufficient flexibility in their programming so that meeting the minimum requirements for the building standards is not insurmountable. The benefit of requiring a consistent set of minimum standards across uses is that it supports the

pedestrian experience and improves the connection between buildings and the public realm by creating active street frontages.

Chapter 4: Zoning – Article 4.7 Building Standards

16. Motion to modify Article 4.7.02-3 (Cottage Court requirements) to change the shared court width from a minimum of 25’ to 15’ and change the shared court minimum depth to “not applicable”.

Staff Response:

Staff recommend an alternative to this amendment that reduces the required shared court width to 20’ rather than 15’ and retains the minimum short court depth. This alternative continues to allow for quality communal space while also reduces the minimum shared court width, enabling additional development area. See Amendment #19 of the *Updated Staff Recommended Amendments Memo* for more information.

17. Motion to modify Table 4.7.01-5 (Apartment Buildings) to remove the requirement for street-facing building entrances.

Staff Response:

Staff do not support this recommendation. The Land Use Plan promotes walkable neighborhoods and encourages compatible development, which is described as buildings that are added to an existing neighborhood that fit within the established context in terms of building size, shape, and location, the relationship between the building and the street, and how people and cars access the property.

Providing a street facing entrance for apartment buildings supports walkability and is compatible with the established context of buildings in existing neighborhoods having entrances that face the street and public sidewalks. Removing the requirement for one street facing entrance conflicts with the Land Use Plan’s neighborhood form guidance.

Only one entrance to an apartment building, either an individual unit or shared building entrance needs to face the street which provides ample flexibility. Removing the requirement for one street facing entrance reduces interaction with the public realm.

18. Motion to amend Table 4.7.02-6 to allow neighborhood commercial buildings mid-block and require neighborhood commercial structures mid-block to comply with the setbacks for the districts.

Staff Response:

The UDC currently allows neighborhood commercial use to be a conversion of existing structures in any location where the building type is permitted, including mid-block (see Section 4.7.02-G.3 and Table 4.7.02-6 Building Standards of the UDC). Staff continue to support that intent, however staff do not recommend expanding the allowance to new development of neighborhood commercial buildings, mid-block.

Conversion of existing structures is supported through the Land Use Plan reference to incentivizing adaptive reuse and because the impacts of an existing structure are generally already experienced. Expanding permission for new neighborhood commercial uses to mid-block introduces new impacts and has the potential to diminish the focus on residential across the district. Broadly supporting new neighborhood commercial to any location in residential districts (beyond corner parcels and existing structures) raises concerns over traffic, and parking, and can limit the design flexibility for entrance, driveways, outdoor seating, trash pick-up, and other site improvements. Support for new neighborhood commercial development at corner lots has the potential to open neighborhood serving uses to many residents while also containing potential impacts. In the Urban Residential neighborhoods, where these uses are most likely, there are many corner lots due to the small block sizes and regular street grid. Corner lots account for about 25-35% of lots in these zones. Given that Mixed Use districts are also brought closer to the residential edges with the new zoning map, the needs of the residents will be well served.

Since neighborhood commercial does not require parking, limiting new neighborhood commercial uses to corner lots helps to contain expanded traffic and parking concerns to parcels that are directly adjacent to two streets.

19. Motion to amend Table 4.7.02-6 to increase the maximum size of neighborhood commercial to 5,000 square feet.

20. Motion to direct staff to investigate mechanisms such as FAR (or similar tools) to scale the maximum neighborhood commercial building size relative to lot size, while

ensuring that commercial buildings in residential districts remain compatible with neighborhood character.

Staff Response (to #19 and #20):

Staff consideration of the recommendation relating to adjusting the maximum size of neighborhood commercial as well as the recommendation pertaining to investigating FAR for guiding the scale of neighborhood commercial use are related. Therefore, the staff response to both motions is combined below.

From early in this process, staff have heard public interest in allowing some degree of small-scale neighborhood commercial in residential areas with recognition that impacts of the use should be addressed so that context and compatibility are also considered.

The Planning Commission recommendation to increase the maximum size of neighborhood commercial in all zones to 5,000 square feet continues to acknowledge the need for a maximum size for this use, but a single square footage cap for all residential areas does not take into account the nature of the different residential Place Types. A larger maximum square footage (to 5,000 square feet) makes sense for zoning districts that tend toward larger lots, creating a compatible relationship, like those found in Limited Urban and Rural districts. However, a maximum of 5,000 square feet for the Urban Residential districts does not align with the typical parcel sizes for those areas. The purpose of the size limit is to prevent a commercial use that generates more traffic and activity than is appropriate for a residential neighborhood and at a level that cannot be mitigated with other strategies.

In the interest of keeping neighborhood commercial small in scale and compatible with these different types of residential neighborhoods, staff also recommends retaining two different maximum square footages – one for the Limited Urban and Rural residential zones and another for the Urban residential zones. This approach is supported by the Land Use Plan Implementation Action #66 (Code): “Allow certain small-scale neighborhood commercial developments to be allowed in more or all residential zones. Put limitations on these uses into code related to location, uses, and intensity. Other mitigating regulations could address operating hours, noise, lighting, buffers, and similar issues.” See Amendment #20 of the *Updated Staff Recommended Amendments* Memo for more information about staff’s recommended update to the maximum sizes.

Based on the Planning Commission discussion and recommendation, staff recommend incorporating FAR for neighborhood commercial use so that there is a compatible relationship between building development and parcel size. See Amendment #3 and #20

of the *Updated Staff Recommended Amendments* Memo for more information and the recommended FAR.

Chapter 4: Zoning – Article 4.8 Uses (Parking Requirements)

21. Motion to recommend that City Council explore eliminating commercial parking requirements.

Staff Response:

Staff do not recommend eliminating commercial parking requirements. The UDC significantly reduces the amount required for commercial uses and retains the parking reductions from Title 20. By providing a minimum requirement for off-street parking for commercial uses, this can help to reduce the impacts of spillover parking onto local streets.

Rather than eliminating parking requirements for commercial developments, staff recommend increasing flexibility through implementation of the Transportation Options Action Plan during the next phase of code updates focused on incentives. The goal is to make sure that the City is adequately mitigating the impacts of new development and not shifting the burden to the public right-of-way. While many communities have lowered or eliminated commercial parking standards, there is also concern within Missoula about unintended impacts of spillover of commercial parking into residential neighborhoods.

Overall, staff can continue to monitor the effect of eliminated parking requirements for residential and reducing the parking requirement for commercial uses and make adjustments to this approach in future UDC amendments as needed.

22. Motion to remove the long-term bike storage requirements from the Allowed Use Table in Article 4.8 and associated amendments in Article 4.9.

Staff Response:

Staff do not support removing long-term bike storage for residential uses in particular. Land Use Plan promotes walking and biking to reduce vehicle trips and emissions and supports short- and long-term bike storage as part of multi-modal transportation. Several policy objectives within the Plan address the need to provide sufficient access to services

and amenities by walking, biking, and transit and stress the significance of planning for sustainability goals through building climate-resilient infrastructure. Notably, an objective also stresses effective urban planning practices for mitigating climate change is by protecting and strengthening the urban forest, using green infrastructure to reduce stormwater and prevent pollution from runoff, and promoting walking and biking to reduce vehicle trips that cause greenhouse gas emissions. This motion removes a facility the Plan encourages for climate and sustainability goals.

Multi-modal transportation is critical to allowing Missoula to grow without overwhelming our transportation system. While we are making strides to improve the infrastructure serving existing and new areas of growth, bicycle storage provides needed facilities for the start and end of every trip. Storage is needed for security from theft and weather elements, to address policy misalignment from previous decades focused primarily on vehicle trips, and to address the existing need for bicycle storage that is not currently provided in the right-of-way.

Staff do recommend adding short-term bicycle parking requirements. This was an oversight in drafting the building use table in section 4.8. See Amendment #27 in the Updated Staff Recommended Amendments Memo.

23: Motion to amend 4.9.04(E)(2) to allow short-term bicycle storage to be located in the public right-of-way, with approval of the City Engineer, in all UMU districts, Downtown Transition (D-T) districts and the Downtown Core (D-C) districts.

Staff Response:

Staff support use of right-of-way for some bicycle storage uses, especially when there is a mixed-use development and street design that includes a furniture zone (e.g. concrete sidewalk out to curb with tree wells). The UDC already considers this allowance for bicycle storage in the right-of-way for U-MU3, U-MU4, and Downtown zoning districts with approval of the City Engineer (see section 4.9.04-E.2.d in the UDC). The recommendation expands the consideration to all Urban Mixed-Use zones. The Planning Commission motion aligns with guidance for bicycle infrastructure in mixed-use and downtown areas.

See Amendment #51 in the *Updated Staff Recommended Amendments* Memo for more information.

Chapter 4: Zoning – Article 4.8 Uses (Use-Specific Standards)

24. Motion to limit the maximum height of a radio tower to the maximum height in residential districts.

Staff Response:

Staff do not support this recommendation. Under the current Title 20 zoning code, radio towers are exempt from height regulations but require conditional use approval from City Council. The new code does not have conditional uses. The UDC Adoption Draft included a 100-foot height maximum for radio towers in residential districts, considering what height may be necessary for a radio tower to function. The height is mitigated by the required setback, which is equal to the height. In other words, a 100-foot-tall radio tower would be required to be located 100 feet from all property lines.

Planning Commission's recommendation reduces the allowed height to the maximum height of the zoning district. This recommendation ensures the scale of towers is in line with surrounding residential development. However, radio towers are unlikely to function at the residential district height limits. If City Council believes the height should be reduced, it would be more direct to prohibit radio towers in residential zoning districts than to limit height to an unfeasible limit.

Chapter 4: Zoning – Article 4.9 Site Development Standards (Landscaping Requirements)

25. Motion to modify landscaping percentage requirements as follows:

- **U-R3: from 20% → 15%**
- **U-R4: from 20% → 10%**
- **All Urban Mixed-Use zones: from 15% → 10%**
- **Downtown Transition: from 10% → Not Applicable**

Staff Response:

Staff do not support this recommendation. Minimum landscaping percentages are an important tool that supports the City's climate goals by preserving permeability, supporting stormwater management, and providing adequate shade and mitigation against the urban heat island effect.

FAR, maximum height, and setbacks are the primary factors in the code that determine the size of buildings. Staff have found that a 20% landscaping requirement in the Urban Residential zoning districts does not prevent a project from achieving the maximum floor-area ratio and number of units allowed – in many cases, this requirement could be met in the required setbacks of a property. Additionally, the UDC includes incentives to reduce the landscaping requirement by up to 30% if a pollinator garden or native prairie is planted, providing more flexibility for projects.

For this reason, staff do not believe that the landscaping requirements as proposed present a barrier to housing development and should be maintained as an important balance to increased development throughout the community.

26. Motion to amend the landscaping section of the Unified Development Code (UDC §4.9.02) by adopting, in whole, the series of text amendments contained in the document titled “UDC Landscaping Amendment Version 2” (as displayed on screen).

Staff Response:

Staff support some, but not all, of the recommended amendments in the document titled “UDC Landscaping Amendment Version 2”.

The amendments supported by staff are described in the *Updated Staff Recommended Amendments* Memo. See the amendments listed below in that document for more information:

- Amendment #29: Fix landscaping typos
- Amendment #30: Clarify activity area counts towards general site landscaping*
- Amendment #41: Clarify raised planters are allowed in garden activity areas*
- Amendment #42: Reduce parking lot landscaping trigger from 3,000 SF to 3,300 SF
- Amendment #46: Clarify perimeter parking lot landscaping must be on street side
- Amendment #47: Simplify landscape buffer widths and reduce fence height**
- Amendment #48: Reduce organic mulch width for shrubs and perennials

* These amendments have been modified in staff’s recommended amendment language, but the intent and outcome remain the same.

** Staff propose an alternative amendment that reduces the fence height to four feet as buffers for vehicular use areas and drive-through facilities. Staff do not recommend

reducing the fence height for industrial uses abutting parcels that contain residential or may contain residential in the future. A four-foot fence is adequate for mitigating the impacts of headlights on adjacent property but may not be adequate for buffering noise and other nuisances associated with industrial uses.

Chapter 4: Zoning – Article 4.11 Natural Resource Protection

27. Motion to recommend that the Missoula City Council request a comprehensive review of riparian regulations within a year.

Staff Response:

Staff is neutral regarding this recommendation because we've already been directed to do this as part to the developing a comprehensive analysis and approach to mitigating the impacts of growth on sensitive lands (Implementation – Coordination, Action Item #17 of the Land Use Plan.) This motion is duplicative and unnecessary.

28. Motion to amend riparian protection requirements (three-part motion)

- 1. Amend 4.11.02(B) to specify that 310 Permits must be submitted to the Missoula Conservation District for permits outside the 1946 city boundary; and that 310 Permits must be submitted to Missoula County Planning, Development, and Sustainability for permits inside the 1946 city boundary.**
- 2. Amend 4.11.02(D)(1) to state that for properties outside/inside the 1946 boundary, the 310 Permit process will determine required buffer width (not less than the minimums in Table 4.11.02-1).**
- 3. Incorporate language in Article 4.11 to preserve Missoula County Environmental Design Standards' riparian buffer widths (50–450 ft) for lands outside city limits but within the City's growth area that may be annexed (until the City completes its comprehensive riparian analysis and updates its own standards).**

Staff Response:

Staff support the first two recommendations from this motion, which were included in a letter from the Missoula Conservation District. The proposed amendments create clarity on the relationship between riparian regulations and the 310 Permit process and provides notice of the requirements for applicants. See Amendment #54 in the *Updated Staff Recommended Amendments* Memo for more information.

Staff do not support the third amendment. County riparian buffers have not been studied yet in the city. County riparian buffers are large and would create unbuildable existing properties that are fully within the buffer, and these properties would require variances to be developed. The descriptions of county riparian buffers do not include some properties that have not yet been annexed in the urban area.

While this amendment is intended to be temporary until a comprehensive riparian analysis is completed for the city, it has the potential to add complications to the code. A project in the near-term would coordinate with local and state agencies to determine appropriate city riparian buffers.

Chapter 4: Zoning – Multiple Buildings on a Parcel (Townhome Exemption Developments)

29. Motion to allow Neighborhood Commercial Uses within Townhome Exemption Developments (TEDs).

Staff Response:

Staff support this recommendation because it will create ownership opportunities for neighborhood commercial businesses, as supported by the Land Use Plan. Staff expanded on Planning Board's recommendation by including an additional sideboard to only allow one neighborhood commercial structure per TED project. Without this sideboard, it would be possible to create 20 ownership units in certain districts which could each be used for a neighborhood commercial building which does not meet the intent of residential zones. See Amendment #55 in the *Updated Staff Recommended Amendments* Memo for the proposed amendment language.

Additional Questions and Discussion

Topic: Airport Hazard Overlay

The Planning Commission encouraged staff to continue communication with the Airport regarding their request to expand the geographic area of the overlay.

Staff Response:

The Airport has been an engaged partner throughout the Land Use Plan and UDC process. Their primary concern is that the current Overlay boundary does not fully account for long-range airport plans—particularly the future runway—and the associated safety considerations that can arise when development becomes more concentrated in critical areas.

Staff agrees that this concern warrants continued work, but we are recommending that Council proceed with adoption of the UDC and zoning map as currently drafted and treat any potential expansion of the Airport Hazard Overlay as a separate, follow-up map amendment.

The key reason for this approach is that expanding the Overlay is not a minor technical change. It can have significant implications for affected property owners, including changes to development expectations. If Council is to consider expanding the Overlay, staff believes it must be done through a deliberate and transparent set of conversations with the landowners who would be impacted, with a clear explanation of the Airport's future runway plans and the FAA-related safety context that informs those plans. Staff also believe it is essential that the Airport be a central partner in those conversations. The Airport is best positioned to explain FAA guidance, potential risks, and future airport development plans in a credible and technically accurate way and having the Airport at the table is important to ensure property owners are well informed and meaningfully involved.

In short, staff's recommendation is to keep the UDC adoption moving forward as planned and then pursue any Airport Hazard Overlay amendments through a coordinated City Airport process that is grounded in safety, transparent with impacted property owners, and structured to return to Council with a clear, well-supported amendment proposal.