

Date: 1/26/26

To: Missoula City Council

From: Common Good Missoula

Re: UDC Amendments

Common Good Missoula commends the Council on your close attention to detail and thorough review of issues in the new Unified Development Code. Given where the Land Use and Planning Committee left off on Wednesday January 21st it appears that landscaping requirements will be up for discussion before the full council on Monday January 26. We would take this opportunity to comment specifically on those issues.

First, we support the balance that staff has struck in the Adoption Draft of the UDC with respect to landscaping. We have shared and will reiterate, with some more detail, why we support the 20% landscaping requirement, especially in residential zones:

1. Landscaping, as opposed to impermeable surfaces of all types, allows water to infiltrate to the aquifer and slows the movement of precipitation into our natural waterbodies through the storm sewer system. In the face of more severe precipitation events, more frequently as rain, even in the “winter” months, surface flooding and inundation of the storm sewer system have become even more serious issues. Indeed, the City of Missoula has carved up Takima-Kokaski Park to provide stormwater storage and infiltration as it flows from the lightly developed Takima Road area. With more intensive development needed to address affordable housing needs, private areas with some water storage will become even more critical across the entire city.
2. Moving from 20% to some lower percentage of landscaping will reduce tree requirements on residential lots. Trees are needed to provide shade to mitigate increased summer heat and clean our air. They provide urban wildlife habitat and offer greenscape to preserve the close connection to nature that has benefitted Missoulians since founding and Indigenous peoples for millenia before. While wild spaces and forest can be accessed easily from town, for those confined to their homes even briefly or are otherwise unable to escape the urban environment trees provide a vital

natural connection that has been shown to ease stress. Staff has already reduced tree planting requirements, further reductions are not merited.

We do not find that a 20% landscaping requirement in residential zones will cause a loss in housing. Instead, reductions will result in an increase in paving. In the discussion on Wednesday at LUP an architect was unable to advance a single concrete example of how landscaping requirements cost units in residential areas. If, as staff calculated for a median sized residential lot in Missoula, 20% landscaping results in less than an additional 400 square feet of space versus 15% landscaping (which is basically the setbacks), that is not enough room to build an additional unit. It could add to the other units, but larger is more expensive, so would not create greater affordability.

Moreover, the example shared by a builder on Wednesday did not show a loss of units. Instead it limited paving. Prior parking requirements probably did put a squeeze on space coupled with landscaping. Yet, now those requirements are gone and left to the developer to determine. One of the promised results of getting rid of minimum parking requirements was to have less paving. Why would the City want to provide more room for paving, especially given the benefits of landscaping/trees versus asphalt? Doing so makes no sense to us.

In addition, the current UDC draft provides that landscaping CAN be reduced in exchange for planting native grasses and forbs, providing a pollinator garden or building green roofs (which do not allow infiltration but at least slow stormwater flows and cool rooftops). This flexibility allows room for adjustment while providing benefits similar, if not equivalent, to greater landscaping area.

We do not believe landscaping should be lost based on the record before us. If applicants can advance how such requirements impact their ability to provide additional units, perhaps an exception can be made, as long as the additional unit has affordability. To give landscaping up without that condition makes no sense and will not contribute to meeting the needs of Missoulians.

Finally, concern was expressed about all the pending map amendments and the loss of housing opportunities that would result and therefore landscaping should be sacrificed. We would be so bold to suggest that the Council step

back and look at the cumulative effect of granting all those amendments on housing. We would urge staff to map that picture and give a range estimate of total housing lost if all were granted. Also, having some idea of how much has been given up with each amendment might help the council prioritize and consider the amendments not just on the impact on that neighborhood, but on Missoula as a whole. We firmly believe neighborhoods know their situation well and can offer necessary insights. Those impacts need to be weighed based on the housing lost and the need to equitably share in the burden of providing much needed affordable housing.

Sincerely,

Len Broberg
Chair
Housing Equity Action Team
Common Good Missoula