

July 13, 2020

To Missoula Development Services:

This letter is written in opposition to the proposed rezoning of the quarry at 2920 Expo Parkway in the Grant Creek drainage. I have many issues with this proposal and am in opposition to this change.

My understanding is that at one time, the original zoning for this property was for single family homes. Although the existing zoning allows for development of an apartment complex, I seriously question why apartments were ever approved in the first place since there are currently no apartment rental properties existing in the entire Grant Creek drainage north of I-90, both within the city limits and in the county. The Grant Creek area north of I-90 has been historically developed from ranch lands and been dedicated to home ownership of single-family dwellings and a few condominiums in the Expo Parkway area. If a person chose to rent out their individual home, that was a personal choice, but the vast majority of homes are lived in by their owners. This current zoning did not consider the character of the Grant Creek area north of I-90 and, as a result, did not consider compatible urban growth for this area. This area of Grant Creek is ecologically not the same as the broad valley of the city south of I-90. As a result, I believe the zoning to allow any apartment complex of any size was an unfortunate decision. This was not the most appropriate use of the land as required by your decision criteria for rezoning. Single family homes would have been appropriate in this narrow valley with limited access. Just because you own an empty, flat gravel pit doesn't mean you should be allowed to fill with as many people and cars as you can get into it.

It appears that the only reason for an increase in expansion of the existing approved zoning of the apartment complex is to maximize rental profits for the developer over the long term, with little consideration of what is already going to be long-term impacts of the current zoning on all the existing residents of Grant Creek north of I-90.

In regard to traffic congestion, I believe you should spend several mornings between 7 and 9 am at the intersection of I-90 and the Grant Creek Road to find out just what a problem the existing traffic poses. In particular, you need to focus on the 2-block area between the Elk Foundation Road and I-90. Not a lot of space there. The commercial area north of I-90 was allowed to be over-developed with hotels, restaurants, etc. before serious consideration was made about the effects on residential traffic flow where the road and I-90 intersect. You have already approved an apartment development at 2920 Expo Parkway that did not take into consideration the existing traffic patterns. While there will be an additional lane added this year for turning onto I-90 west bound, most of the traffic, except for tourists, doesn't turn west-bound onto I-90, but proceeds south onto Reserve Street, including east bound traffic on I-90 where a lot of residents turn to go to work downtown. The north bound lanes on Grant Creek Road are not adequate for existing traffic either, especially for turning into commercial developments on the east side of the road. The road turning into Starbucks drive-thru window often has traffic wrapped around their building and ends up out into Grant Creek Road. This blocks the right lane of traffic and there is no plan to fix or expand those northbound lanes. There is traffic congestion as a result of vehicles entering and exiting Grant Creek Road from McKenzie River Pizza, Starbucks, Best Western, the Town Pump and the ski area parking lot (soon to be a city trailhead development onto newly acquired

wildlands), all within the span of several hundred feet. Now the developer wants to add more apartment units to the project? Who benefits from that additional vehicle traffic trying to get up and down Grant Creek and Reserve Street other than the developer? I've seen traffic backed up past the Elk Foundation road now without any new apartment development at Expo Parkway! How many more cars would be permanently added to this concentrated 2-block area between I-90 and the Elk Foundation Road? I fail to see how an inadequate road system promotes public safety with the additional traffic congestion. I also do not see how increased pollution due to traffic delays in this 2-block area provides for adequate air quality. I believe a study on air quality in this 2-block area would show that particulate matter is significantly higher than would normally be expected due to this concentrated area of traffic.

There is no public transit in the area, and according to managers at Mountain Line, it will be a long time before any public transit will reach this area. As a result, public transit cannot be looked upon as a partial remedy to alleviate traffic congestion.

The current turning lane expansion on the south bound lane of Grant Creek Road is intentionally not supposed to impact Grant Creek. If this rezoning proposal is approved, will the next expansion to handle the additional traffic encroach on Grant Creek, i.e., put more of it into a buried culvert? There is little room for expansion of Grant Creek Road in this confined area without burying more of Grant Creek in a culvert which will result in impacts to the riparian area. The primary cause of any further negative environmental effects of encroachment on the stream corridor would be approval of this rezoning. The additional traffic alone from the current zoning will affect water quality in the stream due to the road's continuing encroachment on the riparian area.

How will the current zoning and the proposed zoning, especially in regard to traffic congestion, affect evacuations in the event of a major wildfire in the Grant Creek drainage? The narrow valley is one-way in and one-way out in the event of evacuation. I fail to see how this proposal promotes public safety in the event of a wildfire. We already have residents living in Grant Creek who are highly concerned about how they will get out during a wildfire, especially through the narrow portion of the canyon directly north of the Elk Foundation road. What type of mitigation would be required of the developer in regard to building materials and landscaping to meet standards in the home ignition zone within the wildland urban interface? I have spent 50 years in the wildland fire business and am currently the Lower Grant Creek representative for the Grant Creek Wildfire Preparedness Subcommittee. I am also on the command staff of Northern Rockies Incident Management Team 1 and was on the Lolo Peak Fire for 30 days in 2017 when we were evacuating homes in that area. The last fire with evacuations that I witnessed in Grant Creek was in 2016 and it will happen again.

What financial obligation will the city assess in the payment of development impact fees and how will these fees be determined?

How will this proposal impact the student population at Hellgate Elementary and Middle Schools? It is not clear what the estimated population, age group of the residents and the number of cars per unit of a larger apartment complex will look like. If the population has a large number of school age children, services at these schools, including bussing, could be negatively impacted as a result of larger class sizes and more buses travelling into the area, especially in consideration of all the other development that

has and is taking place within the school district.

In the Prospect neighborhood where I live, there was some opposition to the development of the public trail system that has been added to the area in the past several years. Before the trail, the HOA common areas were isolated and available exclusively to the homeowners who paid yearly dues which was one of the benefits of home ownership in the area. Since the establishment of the paved trail, the Prospect Meadows Homeowners' Association had to install private property signs on trails within the HOA to keep trespassers and transients out of the HOA common area along Grant Creek. Adding additional apartment units at Expo Parkway will only increase this problem as trail use will undoubtedly increase. This rezoning request does not consider the effects on non-motorized transportation systems, i.e., the paved trail, and trespass on HOA trails. I do not believe there has been an analysis of projected use on the existing trail system which would be impacted by this amount of additional use not considered when it was constructed.

City leash laws are already not enforced on the new trail system, especially by visitors in hotels or city residents from other parts of Missoula. With the proposed rezoning to 960 units of "dog-friendly" living, how many more dogs will be running loose on the trail system to harass both people, dogs that are on leash and wildlife? We live on the edge of town because we enjoy living in the wildland urban interface where wildlife still comes into our backyard, not the highly developed urban experience represented by a 960-unit apartment complex with 2500 parking spaces. With this proposal we might as well live next to Osprey Field downtown. This is not a suitable or appropriate use of the land adjacent to a largely undeveloped area within and adjoining the Prospect subdivision, including the Marbut Wildlife Sanctuary just minutes walking distance up the trail from this proposal. Once again, a proposal that does not fit the character of the lower end of Grant Creek or the most appropriate use of the land according to criteria for rezoning.

The same situation applies to the private parks in the Prospect subdivision, also paid for by HOA fees. The basketball courts, parks, playground and paved trails connecting cul-de-sacs are also paid for exclusively with HOA fees and not subsidized by the city. The existing and proposed zoning for the apartment complex needs to assure that public park areas are available in that development so that there is no encroachment on the Prospect HOA privately owned parks, or the green areas within the existing condominium development east of the apartment complex. It is not clear that the current or proposed zoning provides for adequate parks within the proposed development. There are currently no public parks in Grant Creek north of I-90 and none within easy walking distance south of I-90. "Green" areas within an apartment complex do not constitute public parks.

What is the responsibility of the developer in controlling noxious weeds within the confines of the property? Not all of the land will be developed due to the existing slope, especially the perimeter of the property. In the Prospect HOAs we have an annual weed spraying budget financed by our annual dues to spray our common areas. There is already a lack of adequate weed control in the area where businesses operate adjacent to North Reserve Street and Grant Creek Road. Increased use of the trail system as well as more vehicles driven into the apartment complex will increase the spread of noxious weed seed. It is a common fact that travel routes, i.e., roads and trails, are avenues for spread of

noxious weeds. The more use, the more spread. Adding additional apartment units with more people and more vehicles has the potential to increase the spread of noxious weeds,

The transient population brought about by apartment living introduces an entirely different clientele to our neighborhood. As witnessed by unlimited development south of I-90 in the past 15 years, this includes a growing number of registered sex offenders who are not a welcome addition to neighborhoods north of I-90 in Grant Creek where many children live. This information is readily available on the Montana SVOR website. This zoning does not promote public health, public safety and the general welfare in adjoining neighborhoods that are exclusively single-family dwellings.

Thank you for this opportunity to address my concerns regarding the rezoning proposal at 2920 Expo Parkway.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael L. Cole", with a long horizontal flourish extending to the right.

Michael L. Cole
2616 Old Quarry Road
Missoula, MT 59808

Lower Prospect Neighborhood