



August 31, 2020

Dear Mayor Engen and Members of Missoula City Council,

Friends of Grant Creek (FOGC) would like to express our sincere gratitude for the ability to not only provide public comment, but to also present during meetings of the Consolidated Planning Board, the City Council's Land Use and Planning Committee and the City Council. We represent the voices of many Grant Creek residents and take that responsibility seriously.

The Grant Creek Area Plan outlines crucial transportation infrastructure goals to ensure the safety of current and future valley residents in the event of an emergency such as wildfire. Dozens of written comments on the FOGC petition reveal the genuine concern many residents feel when confronting the possible tripling of Grant Creek's population at the valley's geographical bottleneck without at least establishing a second route out of the valley first.

Our Missoula Growth Policy 2035, the guiding document for development in Missoula, supports the ideals of the current zoning, as do a number of other city plans. Because so many of Missoula's plans and policies were found to support the current zoning, important questions should be answered before making a decision on the proposed rezoning, a decision the city and its citizens will live with for decades.

Thank you for your consideration of the following questions.

Friends of Grant Creek

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HOUSING

1. Our City Growth Policy, A Place to Call Home and the 2020 Missoula Housing Report (MHR) all show a need for *affordable* homes. However, the developer has stated on numerous occasions that the rezone will contain market-rate apartments only and has made the argument that adding apartment units creates competition that will drive rental prices down.

Missoula has added thousands of apartment units over the past decade. According to the 2020 Missoula Housing Report (MHR), “**Rent prices increased in every single category in 2019** ...it appears the new inventory of rental housing coming onto the market have a base rental price **above** Missoula’s historic prices.” (MHR p.13)

- Is there evidence that adding thousands of apartments has driven or will drive rental prices down?
 - Why does Staff recommend approval for rezoning that offers market-rate rentals and not provide for affordable/attainable housing?
2. According to the 2020 Missoula Housing Report (MHR), rental “**Houses and duplexes had much lower vacancy rates of 2 percent or less there is little new construction of homes and duplexes for the rental market.**” (MHR p.12) Additionally, Our City Growth Policy, A Place to Call Home and the 2020 MHR all state the need for entry-level rental and owner-occupied homes which the current zoning would accommodate.
 - Why does the Office of Housing and Community Development not support the current zoning which permits the type of rental and entry-level housing Missoula most needs (small-lot single-family homes)?
 3. According to the Growth Policy, the cost of transportation is an integral part of the cost of housing and helps determine whether housing is “affordable” or not. The location of this rezone will require vehicle use for employment, education and all services.
 - Why does it seem the cost of transportation is not considered when providing quality, affordable housing for a rezone of this size and location?
 4. The only criterion mentioned by the Office of Housing and Community Development when recommending approval for rezone “allowing the maximum housing units in the proposed development” was the high-density designation on the Future Land Use Designation Map (p.128).
 - Why did the Office of Housing and Community Development not address the goals and objectives listed in the Our City Growth Policy 2035: “Affordable and Fair Housing” (p.61), “Housing and Transportation Linkage” (p.62), “Land Use, Zoning and Neighborhood Design” (p.63), and “Housing – Economic Development Relationship” (p.64)?

TRANSPORTATION

5. The Long-Range Transportation Plan shows that emergency response times beyond the mouth of Grant Creek extend past their 4-minute goal. City Fire did not comment on the additional traffic affecting response times and City Police stated that once the units are filled, there may be an increase in call volumes that will then need to be addressed.

- Are these agencies aware that when the rezone development is at capacity, there will be 10,000 per day additional trips moving through the I-90/Reserve/Grant Creek interchange?
- Will we need a new fire department substation?
- Why is there no comment from the Office of Emergency Management when one of the number one concerns of residents is their safety and unimpeded emergency ingress/egress for residents and first responders knowing the rezone will triple the current population at the I-90 interchange, an overcrowded, critical pinch point?

6. The MDT update reconstruction at I-90/Grant Creek and N. Reserve has been over 20 years in the waiting and will be much appreciated for alleviating current traffic congestion. However, the interchange reconstruction plan was not revised accordingly when the Growth Policy designated the area for high density development. The following transportation entities cite a lack of service for the proposed development.

MDT stated that the level of service will be diminished by development of the proposed rezone and suggested the city and county need to determine impacts and evaluate what mitigation needs to happen to Grant Creek Rd. because it becomes one-lane each direction almost immediately north of I-90.

The MPO doesn't feel the transportation infrastructure will be sufficient as well. "We in transportation think there needs to be a conversation about how this rezone fits into our broader Growth Policy and Long Range Transportation goals. Without access to transit and non-motorized facilities, and with no significant destinations nearby, high density development will create traffic impacts but none of the benefits of density."

Public Works also feels that the TIS significantly underestimates the impact of the rezone.

The Missoula Urban Transportation District cannot provide public transportation because this area is not within the taxing district.

- How can the Staff Report state that the Review Criteria are "substantially" met when these four transportation agencies cite lack of safe and adequate service?
- Would MDT have changed plans for reconstruction of the intersection if notified of the Growth Policy designation of the area for high-density development?

7. The Long-Range Transportation Plan and Our City Growth Policy 2035 both call for development to have access to public transportation. In the Staff report MUDT stated "Inclusion in the taxing district does not guarantee future transit service..." and "implementation of this route is contingent on future Mountain Line funding."

- Can current and future residents be assured that public transportation north of I-90 will be established concurrent with development?

EMERGENCY MANAGEMENT AND MISSOULA COUNTY

8. Many valley residents live in the county and are served by the Office of Emergency Management, Missoula Rural Fire and DNRC through an inter-local agreement; however, there is no comment in the staff report from these agencies. Wildfire in the WUI is very likely, followed by evacuation and traffic congestion as residents leave Grant Creek while emergency responders rush into Grant Creek.
 - Were those agencies asked to review and comment? If not, why not?
9. City and County residents of Grant Creek share resources and are equally impacted by development within the valley. Through our experience over the past 13 years working cooperatively with the city and county to build a multi-jurisdictional trail, we have learned the value of cooperation between jurisdictions. There is an unfortunate gap in the Staff report analysis regarding the ability to keep all community members safe.
 - Since Missoula City and County have an intra-agency agreement for emergency services, have the Missoula County Commissioners or CAPS been consulted about the rezone and its potential effects on their abilities to keep their community members safe?

PLANNING

10. The Growth Policy and Master Parks & Recreation Plan both call out the need for public neighborhood parks.

“Parks should be located within ½ mile of neighbors they are intended to serve.” (Parks Goal 2.1)

“Provide 2.5 acres of Neighborhood Parks and 4.5 acres of Community Parks for every 1,000 residents.” (Parks Goal 1.4)

The proposed rezone would increase the valley’s population enough to trigger the need for a community park and the closest ones are over a mile away. Parks Department’s preliminary comments say the new residents would not be adequately served by existing public parks and the Grant Creek Trail lacks a critical functional link.

 - How can the Staff Report state that the rezone substantially meets Parks criteria when the Parks Department reports that it doesn’t?
11. The Future Land Use Designation Map (p.128, Our City Growth Policy 2035) has been referred to by Staff as the most important piece of the Growth Policy.
 - How can this map be used as the main reason for Staff’s recommendation when the map’s legend states the designations are “approximations” and should be read in conjunction with policy statements found in the growth policy *and* should consider site specific conditions?

12. Both Development Services and the Office of Housing and Community Development seem to have evaluated this proposed rezone in isolation from the surrounding area. In contrast, Missoula City and County applied three times for the BUILD grant because of the importance of planning for infrastructure and smart growth, to mitigate the impacts of development and to consider its cumulative effects. The new Scott Street development, for example, will have a plan before development because of the impacts it will have on the surrounding area and to ensure smart growth. The Grant Creek area desperately needs a plan because of its combination of commercial and residential districts, its location as a gateway to Missoula, and its single ingress/egress. Any development will have direct impact on traffic patterns, quality of life and safety for new and existing residents and visitors.

- How can the Grant Creek area be planned for smart growth development?

13. The Grant Creek Area Plan and the current zoning are supported by Grant Creek residents and the Growth Policy which states:

“Regardless of age of plan, some neighborhoods are still invested in, and rely on, their plans for guidance and continue to work on implementation.” (p. 140)

“In all cases, the land use recommendations from the Growth Policy and associated neighborhood plans should be viewed in conjunction with the goals, objectives and actions of the Growth Policy.” (p. 143-144)

- How can Staff state that “the City Growth Policy supersedes the Grant Creek Area Plan”?

14. The number of additional vehicles and vehicle trips that will be associated with a full build-out of the rezone in addition to the numerous vehicles already idling while waiting to exit the valley will certainly contribute to greenhouse gas emissions and Missoula’s poor air quality. The rezone will also add a lot of impermeable surfaces adding to Missoula’s heat island.

- Why does the Air Quality division of the Health Department have no comments when adding near 1,200 dwelling units in a vehicle-dependent area will have a direct impact on Missoula’s air quality?

15. Hellgate/Big Sky School District did not offer comment.

- How are the schools preparing for the influx of development and students?
- How many students will be generated under current zoning vs. rezoning?
- Will this development and others in the district require major additions or new schools?
- With additional vehicle traffic, will the busses be forced to pick up students even earlier? Will that force more parents to drive students to school and create more traffic?

16. City of Missoula decision makers should be able to evaluate this rezone proposal based on agreed upon facts. In recent public meetings, significant discrepancies about the number of dwelling units permitted between the developer and City of Missoula Development Services have arisen.

- Can the City confirm the Development Services statement that 344 is the maximum number of units permitted on the southern parcel?