The Honorable John Engen
Mayor of The City of Missoula Montana
435 Ryman St.

Missoula MT, 59802

Dear Mayor Engen;

This letter provides my input on the 2920 Expo Parkway re-zoning application RM1-45. I encourage the City Council to *reject* the re-zoning application and maintain the current zoning for 2920 Expo Parkway.

Re: 2920 Expo Parkway re-zoning application RM1-45

I want to communicate my strong support for the City of Missoula Growth and Development Policy 2015 – 2035. The policy is well crafted and provides a positive vision of development of our city in the face of population pressures. The focus on density is particularly important to reduce urban spread and destruction of the qualities that make Missoula a wonderful place to live and work. The Policy is thoughtful about exactly how and where to encourage very dense development. Dense development within the guidelines of the Policy will expand a great, livable city. Development outside the guidelines of the Policy will drive housing outside of the city and drive urban spread – negating the stated goals of the Policy and duplicating the mistakes of many cities in the American west.

I'll detail my reasoning for this position below, but for your ease of managing information, I'll summarize my observations on this page:

### Summary observations:

- 1. *I support the current zoning* of 2920 Expo Parkway because it allows for substantially dense development of the area. The level of density in current zoning is substantial but important for the City of Missoula to continue to provide housing for current and future residents.
- 2. The proposed re-zoning has numerous deficiencies in relation to review criteria of proposed zoning changes: It departs in important aspects from most of the guidelines of the Missoula City Growth Policy; increases danger of fire and evacuation safety; multiplies current traffic safety issues; negatively impacts water quality and storm sewer discharge, air quality, and public transportation; negatively impacts area school planning and capacity all without mitigation.
- 3. The proposed zoning does not correct any current deficiencies or inconsistencies. It is not necessary for safe or profitable development of the parcel now or in the future.
- 4. The nature and magnitude of the deficiencies of the proposed zoning changes make the zoning changes substantially outside of the best interest of the City of Missoula as a whole.

*Please reject the re-zoning change request.* Thank you.

### **Current Zoning**

Current zoning of 2920 Expo Parkway allows development of a little over 500 living units in the area. Zoning provides for a transition from the Prospect area with about 140 single family dwellings in the north end of the zone and a denser development of over 340 multi-story units on the south side of the zone. Current zoning allows almost 18 living units per acre for the entire area and would be a substantially dense development of the parcel. Current zoning is supportive of the Growth and Development Policy; however, it will place pressure on some of the goals of the Growth and Development Policy. These issues can be substantially remediated in the neighborhood with minimal difficulty.

## Missoula City Growth Policy 2015 – 2035

The proposed re-zoning of 2920 Expo Parkway materially violates the Guiding Principals and Actions of the Policy in most aspects.

-Development of the area under proposed re-zoning will not enhance the unique character of Missoula. The proposed re-zoning would allow development of living units that would support about 2,500 people in a very small area. Current zoning would permit a little over 1,000 people and cars — thus pushing safety and livability to the limits of our ability to remediate the impact and continue to have safe, valuable development. Proposed re-zoning will completely overwhelm transportation in the area, increase storm sewer pollution of Grant Creek, and dramatically increase air pollution. The site is not a walkable distance from any grocery or dry goods store and will risk the safety of pedestrians who do choose — or must choose to walk to town. The proposed re-zoning will not foster a sense of belonging to a neighborhood, does not create a community or encourage social interaction. It will develop a dense, automobile serviced enclave that will detract from the livability of Missoula.

## Fire and Other Safety

The proposed re-zoning will substantially increase fire and safety risk. The Grant Creek area is currently served by a single road for access and egress. It is not possible to enlarge the road because of the peculiar geography of the valley. All residents must enter and leave the area through a single road. The proposed re-zoning will more than double vehicular traffic on this single road – directly at the choke point of access to I-90 and North Reserve. This issue is a current problem with access and evacuation in the event of fire in the Grant Creek drainage. Fire in the drainage is not a matter of if – but rather when it will happen. The magnitude of the fire and our ability to get resources by road to the point of attack and finally our ability to evacuate the area in the event of a spreading fire are critical issues. Current roads are inadequate in the event of a large fire event in Grant Creek. Proposed and planned upgrades to the roads will address capacity and safety of the road system – under current zoning – but will be overwhelmed by increasing the population 250% over current zoning. The dramatic increase in population right at the choke point of the evacuation route is a poor choice for public safety.

# Provision of Transportation, Sewerage, Schools, parks

Transportation will be negatively impacted beyond our ability to remediate in the future. Current plans to expand access at the traffic light next to I-90 will address substantial issues that exist with congestion, safety and air pollution under the *current zoning*. The proposed re-zoning will overwhelm the new upgrades and multiply our access, congestion and pollution issues. The traffic study commissioned by

the requestor was performed during particularly low usage months. A study in the winter would find substantial congestion due to traffic to and from Snowbowl. Adding the potential of emergency egress would demonstrate the potential safety problems

Grant Creek is currently negatively impacted by storm runoff with increases in pollutants, nitrogen and pesticides and herbicides from current land use. The proposed zoning will require a large percentage of the area be devoted to impermeable surfaces – buildings and parking – to accommodate the density of the development. The resulting storm sewer runoff from future development will not have sufficient soft areas of uncovered ground and plants to absorb and process petroleum products that collect on hard surfaces – thus negatively impacting the water quality of Grant Creek. If a project has some sort of storm water retention, it will create a route for petroleum pollutants to percolate into the water table of Missoula Valley – affecting drinking water quality.

The zoning changes negatively impact overcrowding and financing of Hellgate Elementary School District. The proposed re-zoning will require an expansion of busing for children, increase the school population and put pressure on school operating costs and capital.

The proposed re-zoning is focused exclusively on density of development and does not provide for adequate parks, playgrounds and neighborhood living and recreation that is a Guiding Principal of the Policy. Current zoning would be supportive of neighborhood development and engagement.

## Effect on Motorized and Non-motorized transportation

The impact on motorized transportation is addressed above – but I will reiterate that the proposed zoning will double the daily amount of vehicular traffic in a relatively congested area, degrade traffic safety and increase air pollution from idling motors at traffic congestion points.

Non-motorized traffic into and out of Grant Creek is relatively unsafe in the current zoning plan. The proposal will make non-motorized traffic decidedly more unsafe and unattractive. 2920 Expo Parkway is 2 miles from the closest grocery and dry goods store – if you are a Member of Costco. Otherwise, it is 2.5 miles to the nearest grocery and dry goods stores. A round trip would take a fast walker 1.5 hours to complete and require carrying purchases for 2.5 miles. If you choose to shop at Wal-Mart, the walk is closer to 3 miles one way...6 miles round trip. No matter the zoning for the area – this area will strongly discourage non-motorized transportation. It would not be following the Guidelines of the Policy to multiply this issue by 250% by abandoning current zoning in favor of the proposed re-zoning plan.

### <u>Promotion of Compatible Urban Growth</u>

The proposed re-zoning does not promote compatible urban growth. Current zoning supports compatible growth by increasing density of population and development to what is a reasonable limit. The proposed zoning will create a housing desert without adequate transportation, services, parks, access and livability. Missoula needs to develop dense housing, but the proposed re-zone will not develop services in the future and will always have transportation and access problems. The proposed re-zoning is not to the benefit of the future vision of Missoula.

### Proposed zoning is single use development

The Growth Policy guides development toward mixed use development within walking distance of grocery and other stores. The proposed zoning change is for single use development only and is outside of reasonable walking distance to Missoula stores or amenities.

### Creation of hubs and social interaction

The proposed re-zoning will not incent the creation of a hub of commercial or social interaction. It is designed to permit the maximum number of living units and will be a source of social and commercial isolation. There is no incentive for commercial development of businesses or social gathering facilities. The services, parks, and trails currently in the Grant Creek area have been developed largely by the efforts of the residents of the area. Current zoning of 2920 Expo Parkway is well within the ability of the neighborhood to service without the need for substantial taxes and investment. The proposed rezoning will overwhelm the neighborhood's ability to provide amenities that are compatible with the Growth and Development Policy – thus putting pressure on the City to increase taxes and capital investment in the area to maintain compliance with the Growth and Development Policy.

Thank you for your kind attention and your service to our community. As I note above, I am a strong advocate of the Growth Policy to develop a community that thrives and avoids the development problems that have plagued so many cities in the western United States. There are great opportunities for dense development – and poor opportunities for dense development.

For the reasons	noted above, the re-zoning	request of 2920 Expo	Parkway is a particularly poor re-
zoning request.	I ask you to support currer	nt zoning and reject th	e applicant's re-zoning request.

Sincerely;

Joel Lankford

5508 Prospect Drive