

Mr. Brewer,

The Office of Housing and Community Development is in full support of the proposed amendments related to Townhome Exemption Development (TED). The amendments are in alignment with recommendations in *A Place to Call Home: Meeting Missoula's Housing Needs*. These amendments align closely with one of the key goals of the adopted housing policy, reducing barriers to new supply and promoting access to affordable homes. Specifically, they represent opportunities to reduce development costs and address barriers to building to currently zoned density.

The proposed TED amendments align with the following recommendations found in *A Place to Call Home*:

- Administrative approval for TEDs under the cap of 10 units (in R Districts, except R3, RT5.4 and RT10 Districts) and 20 units (in RT2.7, R3, RM Districts, All B,C, Districts M1R).
  - *A Place to Call Home* recommends the following:

“Ultimately, the City may want to consider a two-tiered approach that increase the size of by-right approval for TEDs to 10 units. Given the problematic nature of very large TEDs, which challenge the local government’s ability to protect general health and safety as provided for in the subdivision regulations, a higher tier of regulatory oversight should be considered for projects over a certain threshold”.
- The elimination of minimum parcel size for lots created in subdivisions approved under MCA 76-3, chapters 5 and 6 after May 6, 2019.
  - *A Place to Call Home* recommends the following:

“The current land use code limits minimum lot size at 3,000 square feet. Allowing smaller lots is contemplated as an incentive for TED and subdivision development under the proposed program, which could serve as a valuable pilot for eventual changes to underlying code across the board. This is critical for promoting infill development while also ensuring overall housing affordability”.

Thank you for the opportunity to provide comment and support for these proposed changes.

Eran Fowler Pehan  
Director  
Office of Housing and Community Development  
406-552-6395

Ben,

Thanks for giving us the opportunity to comment on the proposed amendments for the Townhome Exemption Developments. The Parks Department supports the proposed changes as drafted, particularly in regards to 20.40.180. Item G. Parks and Trails.

Please let me know if you have any additional questions.

Thanks

Neil

Neil Miner, PLA

Parks and Trails Design/Development Manager

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Ben,

On page 9 under section E. 3. I would like to add after "...must meet engineering requirements and the requirements of the adopted Fire Code at the time of construction."

I would like to see a subsection (maybe after Transit) entitled Fire Protection and have the following language attached:

- TED projects are subject to compliance with the adopted Fire Code.

I would also like to see a sentence within the subsection of Review Process and Submittal Requirements, something along the lines of:

- TED projects require the review and approval of the Fire Chief or his designee.

I hope that covers it, give me a shout if you need clarification on any of this. Thanks Ben for the opportunity to comment, I think this is a good step forward for these TED's.

Gordy Hughes  
Assistant Fire Chief  
552-6189

**BEN:**

I believe that I have possibly figured out your MCA citation problem in the draft ordinance text. The word "chapter" is erroneous and should be "part(s)" This needs to be corrected at three (3) locations that I previously identified to you.

The correct language should most accurately be cited as MCA, title 76, chapter 3, parts 5 and 6.". This revised language needs to be corrected in three (3) locations.

JIM NUGENT  
City Attorney  
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