From: Beth Berlin
To: Grp. City Council and City Web Site
Subject: Fwd: Greenough Heights comments
Date: Tuesday, April 5, 2022 5:21:37 PM

I live in the area and have several comments on this proposal.

1. The developers have stated that this development is NOT in the air stagnation zone. It is. As Such, there are specific requirements that the developer must follow during construction and possibly post construction. Please have air quality staff and the Missoula City County Health department comment on this project and others.

2. The developers have stated that this subdivision will have no considerable transportation impacts or impacts to community services on the surrounding area. The only transportation evaluation pertained to the impacts from the estimated vehicle miles traveled by the residents in the proposed subdivision. Specifically, the project may have considerable impacts to those using the Duncan drive corridor for both residential and recreational purposes. Residents in the area will tell you that access on to Duncan drive is already challenging due to train traffic at the bottom of Duncan drive causing backups due to current residential traffic and from others accessing recreational areas up Duncan Drive and in other areas of the Rattlesnake. Without taking the necessary steps to mitigate the impacts of more vehicles, turning left on to Duncan drive from this proposed development will be risky and dangerous. Limited one road access, increasing train traffic, access to the Waterworks hill recreation area already makes travel on Duncan very challenging, and this is not even mentioned in the proposal. Further, the proposal includes no discussion or evaluation of the cumulative transportation impacts on emergency response plans or policies. While this may not be currently required in proposals, the community must consider how continued development up Duncan drive, the Rattlesnake corridor, and in other fire prone areas directly impacts the ability of both residents and recreationists to exit the area safely in the case of a wildland fire. What community emergency response plans for wildfire or other emergencies have been developed? Do they adequately consider the number of residents or visitors? Any housing proposal in these areas must consider these risks. Saying police services are near the area does not adequately or comprehensively address this need. We need further community discussions about how to best mitigate these risks and be prepared to adjust our community development strategies accordingly.

3. While the density in the proposal does meet the thresholds in the Comprehensive plan and updates and in recommended zoning, this proposal does mention the constraints to development on the site due to some severe (possibly unstable) slopes where buildings are proposed. The staff report recommends further geotechnical evaluations to determine the stability of the soils on sloped areas, and I support this requirement as a condition of development. Unstable slopes may mean even less development on the site than what is currently proposed.

4. While the impacts on wildlife on this important recreation corridor are barely mentioned in the

proposal, like the issue of fire impacts, this too begs for a much larger community discussion. There are cumulative impacts of development on wildlife corridors that must be considered. Much of our wildlife uses the creek as a means to travel to and from the Rattlesnake recreation and wilderness areas. The creek is also an important fishery that is currently being restored upstream. We know from wildlife managers that with climate change and more droughts, many species will be pushed down from higher elevations into lower areas - including into our wildland urban interface - in search of food. The more people, the more chances for conflicts with humans. How do we adjust our developments to avoid more conflicts and impacts?

5. As far as I can tell, there was one poorly attended neighborhood meeting during Covid last year to seek neighborhood input on this subdivision proposal. Meeting notices went to the neighbors but to no one else in the area. The impacts of this subdivision and others on the entire rattlesnake area needs to be considered. As stated above, the more development, the more vehicles, and the cumulative impacts of this must be considered. Residents in the area need to be given ample opportunities to comment on these proposals in the planning stages, and in this day and age of social media and electronic correspondence there is no excuse not to provide such opportunities. Public participation 101 tells us that the value in public participation is that we end up with better solutions. That is because the people living in the area know it the best. For future projects, I encourage the City to provide further opportunities for meaningful public and neighborhood participation and dialogue beyond just what is required by the subdivision review process.

6. Finally, we must be clear that the Rattlesnake has always been a very desirable area both as a residential area and a recreation area for our entire community. Prices have been high compared to other areas for decades. Therefore, it is important to note that given the current cost of housing in the area, these homes will likely be some of the highest priced homes in our community, likely to each sell for over a million dollars. The desire of some on the council to seek maximum density in this proposal because they believe it will result in more affordable housing is misguided. It will only result in more million dollar homes on site, driving up the average cost per home even further. After years working on affording housing development in our community, I can say that the only affordable housing is that which is developed by a real affordable housing nonprofit such as HomeWord, the North Missoula Community Development Corporation, the Missoula Housing Authority, and their partners. Density can only ensure real affordability if it is specifically baked into the project as a requirement, and as you know, state law recently made that an impossible ask of for profit developers.

Thanks,

Beth Berlin