



December 15, 2009

Laval Means, Planner
Missoula Office of Planning and Grants
435 Ryman
Missoula, MT 59802

Dear Ms. Means,

Thank you for the opportunity to comment on the proposed changes to the section of the City's subdivision regulations that govern development within Riparian Resource Areas (RRAs). The Clark Fork Coalition believes that one of the most immediate threats facing our rivers in Missoula today is increasing commercial and residential development along their banks. People moving to western Montana often tend to love the rivers to death by building new homes right on top of them, simply not realizing the "dos" and "don'ts" of how to responsibly live alongside our streams.

More often than not, threats to water quality and streamside habitat can be resolved by educating citizens about the importance of building back away from rivers and streams, and engaging them in the hands-on management of the riparian resources on or near their property. When landowners recognize how their buildings, septic systems, and landscaping can affect water quality, they are typically much more inclined to make decisions that are good for the rivers they love, and good for their property value, too. The Coalition appreciates the City of Missoula's attention to engaging developers and property owners in protecting our valuable riparian resources while also balancing the needs of a growing community.

Definition (§2-020.95)

Though the functional definition of RRAs is well-defined by vegetative cover types in Exhibit 5, the Clark Fork Coalition believes that using these standards as a stand-alone creates a loophole for several properties within the Missoula region. Many streamside lands in the City's jurisdiction have been previously cleared of vegetation for various land-use practices and would therefore not qualify as a designated RRA. Often, the non-vegetated streambanks in our city are more unstable and prone to erosion, and therefore critically in need of buffers that protect them from development, as well as management plans that encourage restoration and regeneration of native vegetation along their banks.

We recommend that the City include a minimum buffer width that ensures non-vegetated riparian areas are also protected—this width would not necessarily be a line delineating a "no-go zone" for construction activities, but rather a tool that enhances the current functional definition for RRAs by triggering further site-specific review. Coalition

believes that adding a minimum riparian buffer width as expanded criteria for RRAs would allow for Management Plans that are appropriate to a stream's size and riparian habitat type.

We also appreciate the addition of a clearly described definition of "Low Impact Development" (§2-020.62), as this type of development will also encourage the conservation of Missoula's celebrated natural resources.

Subdivision Prohibition (§3-130.5)

The Coalition believes Section B should specifically state that subdivisions must designate building envelopes that are outside of the RRA. This can be enforced during the City's review of the building permit for each lot, and is therefore the most effective means of ensuring development is sited in a manner that protects our water quality and streams.

Trail Construction (§3-130.7)

One of the best ways to protect our riparian resources in Missoula is to connect people with the rivers and streams that flow near their homes—and trails are a low-impact way for citizens to engage with their natural environment. We recommend amending this section to allow for limited and careful construction of trails within RRAs, as well as in the buffer areas. If the City permits well-designed and appropriately placed trails along the water, it will help minimize haphazard, illegally-created access points that may actually cause further harm to riparian areas as citizens trample across the land to recreate near rivers and streams. In addition, streamside trails will help homeowners better manage the riparian resources near their home, and provide educational and recreational benefits for streamside property owners.

Thanks for considering the Coalition's comments. We look forward to continuing to partner with the City of Missoula to create healthy rivers and streams alongside our vibrant community.

Best regards,

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