



January 31, 2011

Colleen Owen
Environmental Specialist
Montana Department of Environmental Quality
1520 East 6th Avenue
Helena, MT 59620

Dear Ms. Owen:

In a letter dated January 5, 2011, you stated that the Montana Department of Environmental Quality (DEQ) is developing a proposed plan for the former Missoula White Pine Sash Facility, and you requested that the City of Missoula provide information regarding anticipated uses of the City property at the former Missoula White Pine Sash Facility. Additionally, in developing this plan DEQ considers "patterns of development in the immediate area" and "indications of anticipated land use from ... local planning officials." This letter comprises the City of Missoula's response as a property owner at the site; additionally, in my capacity as chief municipal planning official I will provide information regarding patterns of development in the immediate area and anticipated future land uses.

Anticipated future uses of City-owned property

The City of Missoula owns approximately 14 acres of the White Pine Sash campus. The eastern portion of the City's property (SCOTT STREET LOTS, S16, T13 N, R19 W, BLOCK XXX, Lot 001, SCOTT LOTS SCOTT STREET LOTS-LOT 1), zoned OP1 (as depicted in Attachment 1, and described in Attachment 2), has, should it receive a "letter of no further action" from DEQ, been cleaned to residential standards and is under development as a City park. Attachment 3 shows a plan for future development of this park. The OP1 zoning designation is "primarily intended to preserve open space and sensitive natural resource areas," and it precludes both residential and commercial development while permitting primarily park and recreation uses. The City has invested heavily in development of the park, and has obtained both the land and cash donations for park development from adjacent landowners on the premise that this property continue as a park. For this eastern portion of the property, for the foreseeable future, the City anticipates use only as a City park and open space.

The western portion of the City's property, (SCOTT STREET LOTS, S16, T13 N, R19 W, BLOCK XXX, Lot 002, SCOTT LOTS SCOTT STREET LOTS-LOT 2; WATKINS LOTS, S16, T13 N, R19 W, BLOCK XXX, Lot 001, WATKINS WATKINS LOTS-LOT 1) zoned City Maintenance Special District (see Attachment 4), has, upon receipt of a letter of no further action from DEQ, been cleaned to commercial standards. This portion of the property includes the City Public Works Department maintenance shops; a small office building for said department; and a large shed for road sand. Funding permitting, the City will replace the existing maintenance shops structure with new structures better designed for this purpose. For this western portion of the property, for the foreseeable future, the City anticipates use only as a site for the City maintenance shops and offices.

Patterns of development

To the east, White Pine Sash is bordered by a principally residential neighborhood of workforce housing which encompasses the Northside Missoula Railroad Historic District.

To the south, White Pine Sash is bordered by the Montana Rail Link switchyards.

To the west and to the north, development near White Pine Sash includes two cemeteries; light industrial and commercial development; an apartment building complex; and a number of parcels that are undeveloped. In general, these properties are zoned either M1R-2 or OP3. The OP3 zoning designation, as described in Attachment 5, is designed to accommodate open space and civic institutions. More specifically, adjacent to White Pine Sash to the west are light industrial properties owned by Montana Rail Link and Allied Waste. Catty-corner to White Pine Sash is a commercial complex housing Bee Alert, the Ballet Arts Academy, Roadway Express, and other small businesses. Adjacent to White Pine Sash to the north is an undeveloped property zoned OP3 and owned by the City of Missoula; an undeveloped property zoned M1R-2; and property zoned M1R-2 that is owned by the Resurrection Cemetery Association of Helena, which is under development as a cemetery.

The area to the east of White Pine Sash is immutably residential. The area to the south is, for the foreseeable future, immutably a railroad right of way. The multiplicity of owners and the relatively open zoning for the area to the north and west of White Pine Sash area make it difficult to predict how the area will develop in the future (excluding the cemeteries). The area is close enough to Downtown, neighborhood attractions of the Northside, and north hills recreational opportunities to be attractive to residential development (witness the River Rock Apartments at 1210 Otis Street), while its undeveloped nature with good road access could make it attractive to light industrial uses. It is most likely that the area to the north and west of White Pine Sash will see a mix of development in the future, including residential, commercial, light industrial, and civic uses.

Future uses anticipated by local planning officials

The entirety of the White Pine Sash campus that is not owned by the City of Missoula is zoned M1R-2 (see Attachment 5). This zone is designed to accommodate limited manufacturing, warehousing, wholesale, and industrial uses, and residential development. M1R-2 permits residential development; public and civic uses (e.g., day care facilities, medical facilities, schools, and parks); and a wide range of commercial and light industrial uses.

Since closure of the White Pine Sash facility, in addition to the existing light industrial uses at Clawson Manufacturing and Zip Beverage, the most nearly-realized proposal for future uses was a 2004 attempt by Sparrow Group to develop the Scott Street Partners property (SCOTT STREET LOTS, S16, T13 N, R19 W, BLOCK XXX, Lot 003, SCOTT LOTS SCOTT STREET LOTS-LOT 3) for residential use. Sparrow submitted an Interim Remedial Action Work Plan for the northern portion of White Pine Sash, and submitted a request to the office of Planning and Grants for subdivision for 95 single family homes and 160 multi-family units. The City of Missoula applied to the U.S.

Department of Housing and Urban Development for a \$1.8 million Section 108 Loan Guarantee to provide housing for low- and moderate-income homebuyers within "Sparrow Communities."

In 2008, Scott Street Partners initiated a request that its portion of White Pine Sash be rezoned to prohibit residential uses. Amid neighborhood opposition and concern about the consequences of such a rezone, that request was never acted upon by the City. I am unable to anticipate whether that request will be revived.

As stated previously, the only foreseeable future uses of the City property are current uses: a park for the eastern portion of the City-owned property and City office and maintenance shops facilities for the balance. Likewise, it is difficult to imagine that the Zip Beverage property (WATKINS LOTS, S16, T13 N, R19 W, BLOCK XXX, Lot 002, WATKINS LOT 2 OF WATKINS ADDITION)—bounded by the City maintenance shops, the switching yard, and the Scott Street Bridge—would ever be developed for residential use. Instead, it is most likely that the Zip property will continue to be used in a light industrial and/or commercial capacity. Accordingly, the City believes that DEQ should establish cleanup levels on this portion of the property that permit the safe continuance of this type of use.

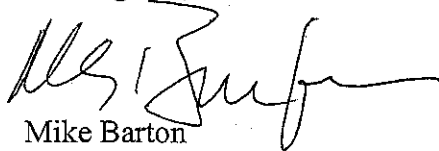
The most likely future use for the northern portion of White Pine Sash (that owned by Scott Street Partners and Clawson) is less certain. However, the property:

- 1) Is adjacent to a park and a residential neighborhood;
- 2) Is convenient to Downtown and the Northside;
- 3) Is flanked to the north by recent residential development; and
- 4) Has been the subject of earnest residential development efforts.

This leads me to conclude that residential use is one of the most valuable and most viable potential future uses of the northern portion of White Pine Sash. Accordingly, the City believes that DEQ should establish cleanup levels on the northern portion of the property that would permit such development in the future, and guarantee the health and safety of potential future residents.

Thank you very much for your consideration of these comments. If I can provide any further information, please do not hesitate to contact me.

Best regards,



Mike Barton
Director
Missoula Office of Planning & Grants

cc: John Engen, Mayor
Steve King, Public Works

John Adams, Office of Planning and Grants