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MEMORANDUM

DATE: October 29, 2026

TO: City of Helena Planning Commission
City of Helena Commission

FROM: Ellie Ray, Senior Planner
Christopher J. Brink, Community Development Director

SUBJECT: **Consider a Resolution to amend the 2025 Helena Forward Land Use Plan and Future Land Use Map**

Section 1 - Project Overview

In accordance with Montana Code Annotated (MCA) § 76-25-201, City Staff are recommending the City Commission amend both the Land Use element of the Helena Forward Land Use Plan (LUP) as well as the Future Land Use Map (FLUM), both adopted by Resolution No. 20159 on November 17, 2025. The LUP's land use element is being considered for updates to add non-substantive data analysis to the existing text, which will bolster the community's understanding of areas that may benefit from development pattern changes to create more sustainable, complete neighborhoods. The adopted FLUM, meanwhile, requires corrections to the area generally located north of West Custer Avenue, east of Green Meadow Drive, south of Grizz Avenue, and west of Cooney Drive. Additionally, staff are proposing a further FLUM map amendment for the area north of Road Runner Street, south of soon-to-be-renamed Lander Road, west of McHugh Lane, and east of Cooney Drive. These areas on the FLUM currently indicate lower-density development and differing land uses than what either exists on the ground today, is under development, is proposed development in the near future, or that property owners are entitled to under existing zoning district designations in both areas.

Findings of Fact

1. The City of Helena adopted the Helena Forward Land Use Plan and Future Land Use Map via Resolution No. 20159 on November 17, 2025.
2. The Land Use Plan is a long-range plan that considers issues and proposed policies as well as future land use designations for the community. It is not regulatory in nature and does not identify specific zoning within the document. Rather, zoning, adopted in substantial compliance with the LUP and MLUPA, is a means of implementing LUP policies.
3. Section 76-25-201 of the MCA sets forth procedural requirements for the legislative adoption of amendments to LUPs and FLUMs, including public notice and participation requirements in accordance with § 76-25-106, MCA, and the City's Public Participation Plan.
4. Section 76-25-201(7), MCA, requires the Planning Commission to conduct a public hearing and make a preliminary determination of:

   …whether the proposed land use plan or future land use map amendment results in new or increased impacts to or from local facilities, services, natural resources, natural environment, or natural hazards from those previously describe and analyzed in the assessment conducted in the development of the land use plan.

   a. If new or increased impacts are found, City staff shall "collect additional data and conduct additional analysis necessary" for consideration by the Planning Commission prior to the City Commission considering amendment to the LUP or FLUM.
5. Section 76-25-201(8), MCA, dictates that the City Commission may not amend the LUP or FLUM until the amendments are either found to be in substantial compliance with the adopted LUP or any potential impacts found are made available for public review and comment and fully considered by the Commission.

Land Use Plan Goals and Objectives

The Helena Forward Land Use Plan contains the following policy objectives that demonstrate substantial compliance with proposed LUP and FLUM amendments:

1. Action 5.1: "Require well-designed, walkable residential developments with access to open space, recreation, commercial centers, and community services."
2. Action 5.3: "Buffer residential areas from incompatible uses and promote transitions between housing types."
3. Action 5.6: "Encourage the development of gridded street patterns in all neighborhoods to provide greater connectivity for all transportation modes."
4. Action 5.7: "Encourage additional missing middle housing types to accommodate renters and homeowners of all incomes and abilities."
5. Action 5.8: "Promote a mix of housing options that complement the existing neighborhood character, support the market, meet the needs of residents, and encourage a livable
6. Community."
7. Action 5.9: "Encourage housing options that allow senior residents to remain in the community in walkable, livable neighborhoods near services and amenities."
8. Action 6.17: "Ensure that all new developments align with the Future Land Use Plan and are compatible with surrounding uses."
9. Action 6.19: "Promote infill development and the redevelopment of underutilized parcels."
10. Action 6.23: "Encourage the development of complete streets that prioritize multimodal transportation along key commercial corridors."
11. Action 6.41: "Prioritize mixed-use spaces that combine residential, retail, and office functions to boost activity throughout the day and night."
12. Action 7.2: "Continue implementing the Complete Streets Policy and following the Public Right-of-Way Access Guidelines (PROWAG)."
13. Action 7.3: "Improve connectivity within the roadway network to meet the demands of future growth."
14. Action 7.20: "Utilize the updated Long-Range Transportation Plan to identify areas of connectivity to key community destinations."
15. Action 8.1: "Support future and ongoing city facility upgrades through Capital Improvement Projects to ensure long-term functionality."
16. Action 8.7: "Conduct regular assessments of public facility conditions and service demands to accommodate anticipated population growth and demographic shifts."
17. Action 8.11: "Enhance wildfire mitigation through partnerships with the Montana Department of Natural Resources and Conservation, Lewis and Clark County fire departments, and neighboring counties."
18. Action 8.23: "Invest in new school facilities as needed to accommodate population growth and neighborhood shifts."
19. Action 8.30: "Plan for and prioritize the development of new healthcare facilities to accommodate the increasing population, ensuring that both primary and specialized care are accessible to all

residents."

20. Action 8.32: "Enhance public transportation options to ensure that all residents, especially those without private transportation, can access healthcare facilities easily."
21. Action 8.35: "Expand and maintain stormwater infrastructure to accommodate future growth and prevent localized flooding."
22. Action 8.36: "Ensure all new developments comply with City of Helena Engineering and Design Standards for stormwater management."
23. Action 8.41: "Evaluate and update stormwater policies as needed to reflect best practices and climate considerations."
24. Action 8.45: "Continue expanding wastewater infrastructure to accommodate new development and support growth in underserved areas."
25. Action 8.56: "Support local and regional efforts to conserve energy, promote recycling and reduce solid waste."
26. Action 9.1: "Work towards acquiring lots that would be suitable for more inclusive park spaces that are multi-generational."
27. Action 9.2: "Partner with other City departments to identify and plan to address key barriers of access to parks and recreational components."
28. Action 9.11: "Continually look for opportunities to increase trail connectivity, active transportation infrastructure and public transit, if it is available, to make access more inclusive."
29. Action 9.20: "Increase ecosystem appropriate vegetation, particularly trees in parks and open spaces, and landscaping on individual properties and boulevards."
30. Action 9.24: "Protect and sustain irreplaceable natural features such as wetlands, stream corridors, and similar high-value areas that provide wildlife habitat, recreational opportunities, improved water quality and safety values such as flood control."
31. Action 9.28: "Evaluate subdivision impacts to ground and surface waters, drainages, floodplains, riparian areas and wetlands, incorporating adequate buffers or requiring appropriate mitigation, including, but not limited to, stormwater treatment and discharges to improve wetland viability."

Section 2 - Staff Recommendation

Move to approve a Resolution to amend the 2026 Helena Forward Land Use Plan and Future Land Use Map.

Section 3 - General Information

Meeting Dates:	City Administrative Meeting – September 23, 2026 City Commission – September 28, 2026 Neighborhood Public Meeting – October 20, 2026 Planning Commission – November 10, 2026 City Commission – December 7, 2026 (Resolution of Intention); December 21, 2026 (Resolution of Adoption)
General Location of FLUM Amendments:	FLUM Amendment Area 1: North of West Custer Avenue, east of Green Meadow Drive, south of Grizz Avenue, and west of Cooney Drive; FLUM Amendment Area 2: north of Road Runner Street, south of Lander Road, west of McHugh Lane, and east of Cooney Drive.

Affected Area FLUM Designations and Definitions:

1. **Suburban Residential**: "*Suburban residential land uses are characterized by low-density residential areas typically situated beyond the city's core. These areas act as a transitional zone between more densely developed urban neighborhoods and rural land. Suburban residential areas should primarily accommodate single-family detached homes, providing a balance between accessibility to urban amenities and the spacious, less dense character of rural living. Suburban Residential may also include context-sensitive single-family attached homes and limited small-scale commercial as appropriate*."

2. **Urban Residential**: "*Urban residential areas are located near Helena's core and are designed to support moderate- to high-density residential development while accommodating a range of complementary business types. These areas should offer a diverse mix of housing options in addition to single-family detached homes, townhomes, duplexes, and triplexes, and multifamily developments of more than four units to promote greater density and housing variety in a walkable environment. Additionally, compatible commercial uses such as small-scale retail, cafes, professional offices, and personal services should be incorporated to encourage mixed-use neighborhoods*."

3. **Mixed Use**: "*Mixed use areas are characterized by developments that integrate multiple, distinct uses either vertically within a single building or horizontally across a unified space. These areas often feature active uses like retail and restaurants on the ground floor, with residential and/or service-oriented uses situated above. Unlike the mixed use development envisioned for Downtown, future mixed use areas should focus less on vertical integration and more on allowing a blend of uses that complement one another. These districts should concentrate diverse residential, office, and commercial activities within a cohesive environment*."

4. **Public/Semi-Public**: "*Public/semi-public land uses include areas utilized for governmental and quasi-governmental purposes such as municipal, county, and state government buildings, schools, non-profit agencies, and community service providers. These land uses provide essential facilities and services to the community. While public/semipublic uses are generally distributed throughout the community, Helena exhibits a higher concentration of these uses compared to other communities due to its status as the state capital and the seat of Lewis and Clark County*."

5. **Parks and Open Space**: "*Parks and open space uses encompass large areas of the natural environment and public and private open spaces of varying size and function. Public open space refers to areas that lack formal recreational purposes, but have landscaping, natural flora, and public easements or agreements in place that allow public access. Private open spaces serve a similar function to public open spaces but without public accessibility. These land uses also incorporate important environmental features such as woodlands and stream*

corridors. Natural open spaces throughout the Helena planning area include areas of land managed by the city, county, state, and federal entities that may require collaboration to maintain and enhance recreational opportunities for residents and visitors."

Section 4 - Public Process

Public Meetings

In accordance with Montana Code Annotated § 76-25-201(6), City Staff were required to formally request the City Commission consider and vote to move forward with a public process to amend the Helena Forward LUP and FLUM. This was statutorily required because proposed amendments were not the result of a petition of the electorate nor were they associated with a developer's request tied to a land use application or permit. This proposal was discussed during an Administrative Meeting held on September 23, 2026, and was formally approved (5:0) by the City Commission in a regular meeting held on September 28, 2026.

City Commission approval to proceed with assessing whether to amend the LUP and FLUM was followed by a public meeting for affected property owners held on October 20, 2026. Four hundred fifty-nine (459) property owners were notified via a postcard mailing of meeting details and an overview of the discussion to take place. Staff solicited public comment in the course of this meeting, which has informed the analysis in this memorandum. Meeting notes transcribed by City staff are provided in this memorandum in Appendix B that capture the substance of comments received and staff responses shared with attendees that evening.

Following the public meeting in October 2026, the City Planning Commission will conduct a public hearing to make a preliminary determination of whether proposed LUP and/or FLUM amendments result in new or increased impacts "to or from local facilities, services, natural resources, natural environment, or natural hazards from those previously described and analyzed in the assessment conducted in the development of the land use plan" [MCA § 76-25-201(7)(a)] to ensure all proposed changes are in substantial compliance with the LUP. The Planning Commission recommendation will be brought forward to the City Commission for consideration in public hearings where the Commission will pass both a Resolution of Intention to Amend the LUP and FLUM as well as a subsequent hearing to adopt a Resolution to formally amend both in compliance with the Montana Land Use Planning Act. In the event the Planning Commission identifies new or increased impacts, the City "shall collect additional data and conduct additional analysis necessary to provide the planning commission with the opportunity to consider all potential impacts resulting from the amendment" [MCA § 76-25-201(7)(b)]. This analysis will be "made available for public review and comment and…fully considered by the governing body" following a further Planning Commission meeting where findings are shared with the board [MCA § 76-25-201(8)(b)].

Public Comment

An integral part of the review process is the conducting of public hearings and the solicitation of public comment. During the October 20, 2026 public meeting, there were sixty-eight (68) attendees, and all comments received that evening are provided in Appendix B of this memorandum. As of October 29, 2026, there have been three additional written comments received regarding the proposed LUP and FLUM amendments (see memorandum attachments). Any comments received during and after the hearing conducted by the Planning Commission will be attached to this memorandum and presented to the City Commission for their review and final decision.

Section 6 – Land Use Element Amendment Evaluation

As part of the contracted services with consultants at Houseal Lavigne, the City has worked to craft enhanced GIS mapping to better discern portions of the community to direct future growth improvements based on a series of qualitative metrics, including land valuations and proximity to existing community assets. This mapping will help inform where future growth and other improvements are directed, and this data will also reinforce the areas the Planning Commission will target for zoning updates by end of summer 2027.

The City's LUP consultant firm staff have crafted two new sets of maps and related analysis for incorporation into the LUP. The Complete Neighborhood Index (CNI) evaluates residents' ability to reach an array of amenities within a 5- to 15-minute walk or bike ride to determine whether they are well-served with access to the parks, schools, grocery stores, medical facilities, and emergency services that lend to a higher quality of life. The second analysis looks at assessed taxable value per acre to better understand land use areas, zoning, and use-types that generate the greatest taxable revenue for the City. This latter data set helps pinpoint the areas that are most fiscally sustainable based on development patterns and underlying uses, and it finds, in part, that the most densely developed, mixed use areas are the most sustainable from a revenue generation standpoint. These data sets were then merged to produce a Strategic Opportunity Framework to pinpoint areas of the community that may benefit from public investment to better leverage and harness an area's growth potential, which can be partly accomplished with future, targeted zoning amendments to produce a greater number of complete neighborhoods in Helena.

Analysis of Impacts

Under MCA § 76-25-201(7), the Planning Commission are required to consider whether proposed amendments produce increased impacts to or from local facilities, services, natural resources, the natural environment, or natural hazards from those previously considered in the adoption of the 2025 LUP. Due to the fact that the proposed Land Use element amendments only entail the incorporation of data analysis and mapping to augment the existing text, the proposed amendments to the Land Use element are not deemed to be substantive amendments in nature, and, consequently, are deemed to be in substantial compliance with the adopted LUP. City staff contend that the new language and GIS maps noted herein reinforce the areas within the community that most need attention and improvement in coming years to become more livable and sustainable. Indeed, the new qualitative and quantitative mapping creates a more robust paradigm to consider future zoning amendments and growth potential.

Section 5 – Future Land Use Map Amendment Evaluation

The area being considered for a FLUM amendment is comprised of land that is currently shown as a blend of Suburban Residential, Urban Residential, Mixed Use, Public/Semi-Public, or Parks and Open Space designations (see Appendix A maps). Areas designated as Mixed Use, Public/Semi-Public, or Parks and Open Space are not currently proposed for a future land use designation change. However, portions of the area currently designated as Suburban Residential and Urban Residential are recommended to be considered for redesignation as Urban Residential and Mixed Use, respectively, in alignment with existing and proposed land use patterns for the area. There are two distinct FLUM amendments that are being proposed, as detailed below.

1. **Area 1**: The first proposed amendment focuses on the land north of West Custer Avenue, east of Green Meadow Drive, south of Grizz Avenue, and west of Cooney Drive. This area includes

properties shown as Mixed Use, Parks and Open Space, Public/Semi-Public, and Suburban Residential on the FLUM. Due to incongruity between the existing land uses, existing residential densities, and property owners' entitlement for denser residential development through existing zoning (majority R-3 Residential, R-4 Residential-Office, and B-1 Neighborhood Business), as compared with current Suburban Residential FLUM designation allowances, staff recommends redesignating these Suburban Residential areas to Urban Residential.

Historically, much of the area in question has been built to a higher density than the single-family detached homes, "context-sensitive attached homes, and limited small-scale commercial uses" anticipated for areas designated Suburban Residential. Examples of this include an array of multi-family dwelling developments and numerous condominiums (this includes portions of the following: the Green Meadow Subdivision, the Stone Meadows Subdivision, the Northgate Meadows subdivision, the Pioneer Meadows and Pioneer Village Subdivisions, and the Barney Subdivision).

The Housing element of the LUP notes that Suburban Residential areas typically develop with 3.73 households per acre, while the Urban Residential typically develops between 3.73 and 9.58 households per acre. In analyzing per acre densities of developed residential parcels in Area 1, the average density per acre is 5.34 units per acre. Consequently, the proposed Urban Residential designation aligns with existing development patterns in Area 1. The proposed redesignation to Urban Residential would align future growth with existing development patterns and current zoning entitlements—some of which has been established for more than 50 years—in allowing for single-family homes, townhomes, duplexes, triplexes, and multi-family developments alongside compatible commercial uses, where appropriate (small-scale retail, cafes, professional offices, and personal service uses).

2. **Area 2**: The second area being considered for an amendment is located north of Road Runner Street, south of the to-be-renamed Lander Road (access to Steed Rentals, LLC, property), west of McHugh Lane, and east of Cooney Drive. This area is comprised of the McHugh Subdivision No. 2 and Tracts A-1-A-2 and B-1-A as shown on Certificate of Survey No. 3370303. This area is currently shown on the FLUM as Urban Residential, and is being considered for a Mixed Use designation. A portion of the area in question is zoned B-2 General Commercial for the Aero Vistas multi-family residential dwelling unit development that will ultimately provide over 200 dwelling units to community residents. To the north of this development is land that, as of writing this memorandum, has a Resolution of Intention to Annex and is awaiting a final passage hearing for pre-zoning of portions of the subdivision under preliminary plat for twelve B-2 (General Commercial) lots, four CLM (Commercial Light Manufacturing) lots, and twenty-four R-O (Residential) lots. Intended uses include higher density residential alongside commercial tracts. Additionally, there are remainder tracts from the subdivision process that will remain in the County and may be considered in a future development phase.

   To the south of the aforementioned tracts is area that is zoned B-2 (General Commercial), CLM (Commercial Light Manufacturing), R-3 (Residential), and unincorporated County land in both the West Valley (#2) Part 1 (citizen-initiated) and County B-2 zoning districts. These properties, located south of Road Runner Street, east of McHugh Lane, north of West Custer Avenue, and east of Cooney Drive, are all designated as "Mixed Use" on the FLUM as befits their historic development patterns. The areas to the north noted in the preceding paragraph are being—or are planned to be—developed in a similar vein to these properties to the south of Road Runner Street. As a consequence, a change in FLUM designation for the areas north of Road Runner, south of the to-be-renamed Lander Road, is appropriate for the higher density, higher intensity

uses and zoning that is either under development or planned for the area in the near future.

Analysis of Impacts

With the proposed amendments to the FLUM, the Planning Commission are required to consider whether the proposed changes are in substantial compliance or produce increased impacts to what was previously considered in adopting the 2025 LUP. This entails an assessment of how the potential for increased density for the area shown in Attachment A may impact local facilities, services, natural resources, the natural environment, or natural hazards, as compared with considerations made in adopting the 2025 FLUM.

1. Local Facilities and Services

a. *Transportation and Mobility*: Transportation facilities assessed in the LUP include the (1) Roadway Network, (2) Bike and Pedestrian Facilities, and (3) Public Transportation, with emphasis placed on the need to further the City's Complete Streets policy and promote connectivity for all system user groups.

Area 1 contains approximately 60 acres of undeveloped land that is currently not city-owned property. The LUP indicates that Suburban Residential areas may see 3.73 households per acre with 2.2 people per household. Across approximately 60 acres of undeveloped land in Area 1, it is anticipated that there could be up to 224 new households under the Suburban Residential designation. Applying Institute of Transportation Engineers (ITE) Manual trip generation calculations to this land area, we can assume the 224 households could each generate approximately 6.74 vehicle trips per day (vpd). This would produce approximately 1,510 vpd. For Urban Residential property, the LUP indicates that there may be 3.73-9.58 households per acre, with anywhere from 224 to 575 households across the 60 acres. Average vehicle trips per day under this FLUM designation could produce anywhere from 1,510 to 3,875 vehicle trips per day.

Area 2 has had the full extent of its traffic impacts analyzed in conjunction with: (1) the development review process for the Aero Vistas multiple-dwelling unit development on 18.3 acres with 200 or greater units at full build out; as well as (2) the property to the north owned by Kim Smith and Steed Rentals, LLC, that has been granted a Resolution of Intention to Annex the first phase of the Crystal Springs Village Subdivision in conjunction with its subdivision and pre-zoning applications. For Aero Vistas, the developer was required to install Road Runner Street between Cooney Drive and McHugh Lane as well as extend Cooney Drive along the property's western boundary, which will help address increased traffic flows. Similarly, Phase 1 of the Crystal Springs Village Subdivision is under preliminary plat, which includes installation of portions of the Wolf Road and Smith Avenue rights-of-way with access to McHugh Lane along with a third, northern to-be-named access from McHugh Lane. The developer's intention to is eventually pursue a second subdivision phase, which would see these rights-of-way extend out to Cooney Drive, along with extending Cooney Drive itself further north adjacent to the second phase of development. Phase 2 may also entail installation of a third, northern access, Old Mine Road, onto Cooney Drive. It is anticipated that these improvements would also serve to ease traffic flows within and surrounding the Crystral Springs Village Subdivision.

With respect to future community growth, the LUP notes that it is critical to ensure that our transportation network "enables easy access to neighborhoods, community facilities, employment areas and recreational opportunities," encouraging a "connected,

pedestrian-oriented, and human-centric active transportation system….” Planning for this multimodal growth, in conjunction with adherence to the City’s 2013 Engineering and Design Standards and Complete Streets Policy (passed by Resolution 19799 in 2010), will be critical to meet both vehicular and pedestrian demand and ensure an adequate level of service (LOS) for City rights-of-way as new development arises. Presently, the City requires submission of a Traffic Impact Study in conjunction with any subdivision application or development proposal that will generate 200 or greater vehicle trips per day, the findings of which may necessitate traffic impact mitigation.

Addressing major street network improvements, particularly to ease congestion and roadway conflicts that may arise in proximity to the proposed FLUM amendment areas (which includes a mix of City, County, and State rights-of-way) is critical to this. Green Meadow Drive and West Custer Avenue are local minor arterial roadways, according to the 2014 Greater Helena Area Long Range Transportation Plan (LRTP). At the time the 2014 LRTP was adopted, it was determined that the level of service (LOS) for the West Custer Avenue intersections with Benton Avenue, Green Meadow Drive, and McHugh Lane were operating at a “C” LOS, which denotes that the intersections were functioning adequately. The intersection of West Custer Avenue and Cooney Drive was rated at a “B” LOS in the LRTP.

The LRTP is currently being updated, and the draft 2026 LRTP analyzes projected volume-to-capacity ratios anticipated by 2046. This draft LRTP now shows West Custer Avenue between Dredge Drive and Benton Avenue with an “E” grade, indicating unstable traffic flow by 2046, and the area to the west extending to the terminus at Henderson Street with a “D” grade, indicating stable traffic flows. Green Meadow Drive from the West Custer Avenue intersection north to John G. Mine Road, however, is graded as a “B,” indicating stable traffic flows. Cooney Drive is unassessed, but McHugh Lane from the West Custer Avenue intersection to Yuhas Avenue is graded “E.” Between Yuhas Avenue and Mill Road, in contrast, the right-of-way is grade “B.” East-west connections through the proposed FLUM designation amendment areas were not scored for LOS.

To mitigate the impacts of future development, the draft 2026 LRTP does recommend that the entirety of the Custer Avenue right-of-way from North Montana to Henderson Street be reconstructed with added network capacity and multimodal accommodations. The draft LRTP also anticipates additional east-west connections to ease traffic burdens, including connections for Wolf Road and Flagstone Avenue. It also proposes the installation of Road Runner Street between Cooney Drive and McHugh Lane, which is under construction as of the writing of this memorandum.

Installing the planned and proposed street improvements, in addition to other improvements required of future land developers in conjunction with site-specific developments or tied to land use actions, will ensure appropriate levels of service are achieved. Ensuring these improvements are made in substantial compliance with the LUP, the draft 2026 LRTP, and all adopted, prevailing City regulations, along with installation of all required pedestrian amenities that comply with Engineering and Design Standards, the Complete Streets Policy, and PROWAG, will be of critical importance to maintaining a healthy transportation network. As development moves forward in Areas 1 and 2, following these analyses, the system will be built out to serve the levels of density and intensity of uses as may be found in the Urban Residential and Mixed Use areas, respectively. Public transportation needs, if following the current system model, will be

an on-demand, door-to-door service for the public, and can, therefore, serve future development needs in both FLUM amendment areas as well.

b. *Community Facilities and Public Services*: These facilities and services include: (1) City facilities that serve as hubs for government operations, public services, and civic engagement, including the Fire Department and Police Department; (2) Education Services; (3) Health and Medical Facilities; (4) Homelessness support services; (5) Public Works Infrastructure, such as stormwater, wastewater, and solid waste.

The City owns and operates an array of public facilities and offers a wide range of services and programs within the community. Presently, the only new facility tied to government operations, public services, or civic engagement that is being constructed is Fire Station No. 3 on East Custer Avenue, approximately 2 miles east of FLUM Amendment Areas 1 and 2. In the course of reviewing site-specific development proposals, zoning permits, map amendments, and other land use applications, emergency service departments are afforded an opportunity to assess and address concerns regarding response.

Educational services in Helena are the jurisdiction of the Helena Public Schools (HPS), private schools, and higher education facilities. Per the LUP, as the community grows, it is essential to ensure "that educational facilities remain modern, well-maintained, and equipped with necessary resources." The draft 2024 Helena School District Facilities Master Plan includes a section dedicated to addressing Demographic Data, District Enrollment Projections and Trends for Facility Needs, which finds that overall district enrollment is anticipated to remain consistent. It does note that there may be future facility-specific enrollment fluctuations to respond to in the future. Increased housing density/opportunities may afford unhoused and unsuitably housed HPS students and their families greater housing options. This may shift populations to other schools within the district if they elect to move elsewhere within the district. However, it is not anticipated that such fluctuations will burden the district system beyond overall capacity or beyond planned improvements to renovate and expand Helena's schools.

Health and medical facilities have grown enormously in the past decade as more facilities locate within Helena or expand sites and/or operations. Clinical and specialist offerings have proliferated, particularly in areas along North Montana Avenue, including in the Skelton Addition less than a mile from FLUM amendment Areas 1 and 2. The LUP recommends that Helena "[p]lan for and prioritize the development of new healthcare facilities to accommodate the increasing population, ensuring both primary and specialized care are accessible to all residents." The proposed FLUM amendments, too, would allow for such uses to exist by-right as compatible commercial activities in both the Urban Residential and Mixed Use areas, further expanding opportunities for new nodes of medical use development in the future. This will enhance the completeness of the FLUM amendment neighborhoods by allowing more complimentary uses in this northwestern reach of the community in line with proposed land use element amendments referenced earlier in this memorandum.

The LUP recommends strengthening partnerships to provide services and housing to community residents experiencing homelessness. While some supportive services for the unhoused may be aligned with Area 1 (ex: healthcare office uses), higher intensity uses would only be contemplated for Area 2 (ex: emergency shelter uses, healthcare facilities). Both FLUM amendment areas, though, would support higher density housing

opportunities, which may benefit low- to moderate-income individuals in providing a wider array of housing opportunities, including for residents on the cusp of housing instability and at greatest risk of homelessness.

The LUP recommends the City (1) "expand and maintain stormwater infrastructure to accommodate future growth and prevent localized flooding; (2) "continue expanding wastewater infrastructure to accommodate new development and support growth in underserved areas;" (3) "utilize the Integrated Solid Waste Master Plan to guide future system improvements;" (4) and "Plan for and establish types and quantities of land uses in Helena supporting community needs, neighborhood centers, aesthetics and the City's long-term sustainability." It is known that public works infrastructure, particularly wastewater, lacks adequate capacity in the FLUM amendment areas. Future developers will continue consider and address all required water, wastewater, and stormwater provisions required to serve their development needs as they arise in compliance with adopted Engineering and Design Standards. Additionally, solid waste management will be dictated by management plans associated with future developments, with service solutions offered by the City's Solid Waste Division. Ultimately, no matter the size and scale of a proposed development activity, service provisions are weighed and considered, and, indeed, the LUP supports upgrades and improvements to ensure the City maintains long-term systems functionality across the board.

c. *Parks and Open Space*: The Parks, Open Space, and Natural Resources element covers, in part, the community's Parks, open Space, Trails, and Recreation needs and how they serve to enhance quality of life for the community and contribute to the City's vibrancy across 30 parks and an extensive trail network, spanning 2,140 acres

   Helena's park system provides a public good for the community in enhancing residents' quality of life. Indeed, access to parks, trails, and open lands for all residents is "essential to fostering a healthy and well-connected community," according to the LUP. Within the proposed FLUM amendment areas, there are three parks or open space areas: Pioneer Village Park, Crystal Springs Park, and Jaycee Park. Within a mile of the amendment areas, there are numerous additional park facilities and outdoor recreation opportunities, including: Lewis and Clark County Fairgrounds and the Van Hook Wetlands, Ryan Park, Skelton Park, Northwest Park, Nature Park, Waukesha Park, Barney Park, and Bill Roberts Golf Course. Considering suitable park land acquisition in the future—through or independent of the subdivision parkland dedication process—is important to meet the needs of residents and to ensure the existing park system remains well managed and able to support continued use. If and when land is proposed for subdivisions in the FLUM amendment areas, in particular, developer parkland dedication proposals will be considered through the adopted process.

2. Natural Resources, Natural Environment, and Natural Hazards: The LUP's Parks, Open Space, and Natural Resources element includes sections that address (1) the natural environment, including land and topography, sand and gravel resources, flora and fauna, air quality, and surface and groundwater; and (2) environmental issues, including flooding, earthquakes, and wildfires.

   As per the Helena Forward LUP, the preservation of the natural environment and resources is intrinsically linked to quality of life for residents. The City must safeguard its natural systems while balancing growth, which can be achieved by employing sustainable development practices as part of strategic planning. FLUM amendment area 1 contains land that was once irrigated for

agricultural use, but this activity no longer exists and the undeveloped land is now considered open space with limited tree coverage. The land is, though, bisected by the Crystal Springs Creek corridor, meaning that riparian and wetland vegetation is present in places and a requisite corridor setback limits growth under Helena City Code § 12-4-11. Any vegetation and wildlife present through the riparian corridor will remain because it will be retained as open space due to development limitations within riparian setbacks. FLUM amendment area 2, in contrast, is the site of former gravel pit mining operations, and, therefore, has limited to no natural resource values to protect, as evidenced in the Crystal Springs Subdivision application.

With respect to environmental issues and hazards for the FLUM amendment areas, land in both amendment areas is classified as Zone X (e.g., located outside of the 500-year floodplain), as shown on the FEMA Flood Insurance Rate Maps Nos. .0049C2306E and 3049C2143E, dated September 19, 2012. The Montana Bureau of Mines and Geology maintains a Geohazards Portal, which shows the FLUM amendment areas as being of moderate liquefaction susceptibility for earthquake activity, with no faultlines within the amendment areas. The Tri-County Regional Community Wildlife Protection Plan, produced by the Tri-County FireSafe Working Group in 2020, denotes the areas as predominantly low-risk for wildlife fire with the exception of a moderate rating for the northwest corners of the Stone Meadows Subdivision (near the intersection of Travertine Way and Andesite Avenue) and Green Meadow Subdivision (western portions of Grizz Avenue and Saints Loop). Consideration of these hazards will factor into new development activities through the application of adopted City regulations and codes, including building and fire codes.

Section 7 - Staff Recommendation

The proposed FLUM amendments are in Substantial Compliance with the goals and objectives of the 2025 Helena Forward Land Use Plan and do not produce an increase in impacts to local facilities, services, natural resources, the natural environment, or natural hazards, as compared with considerations made in adopting the 2025 FLUM.

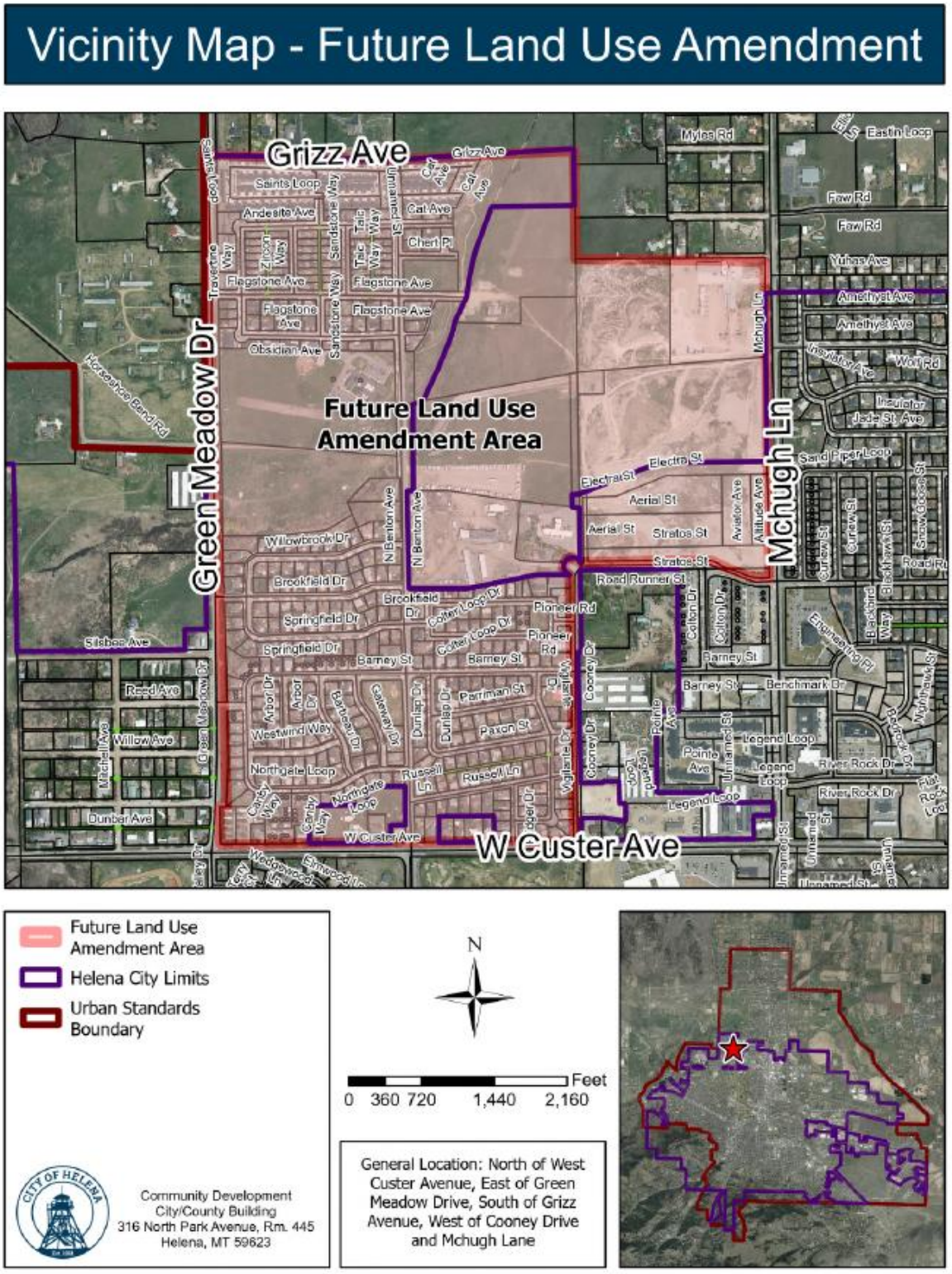
Staff Recommendations for the Planning Commission:

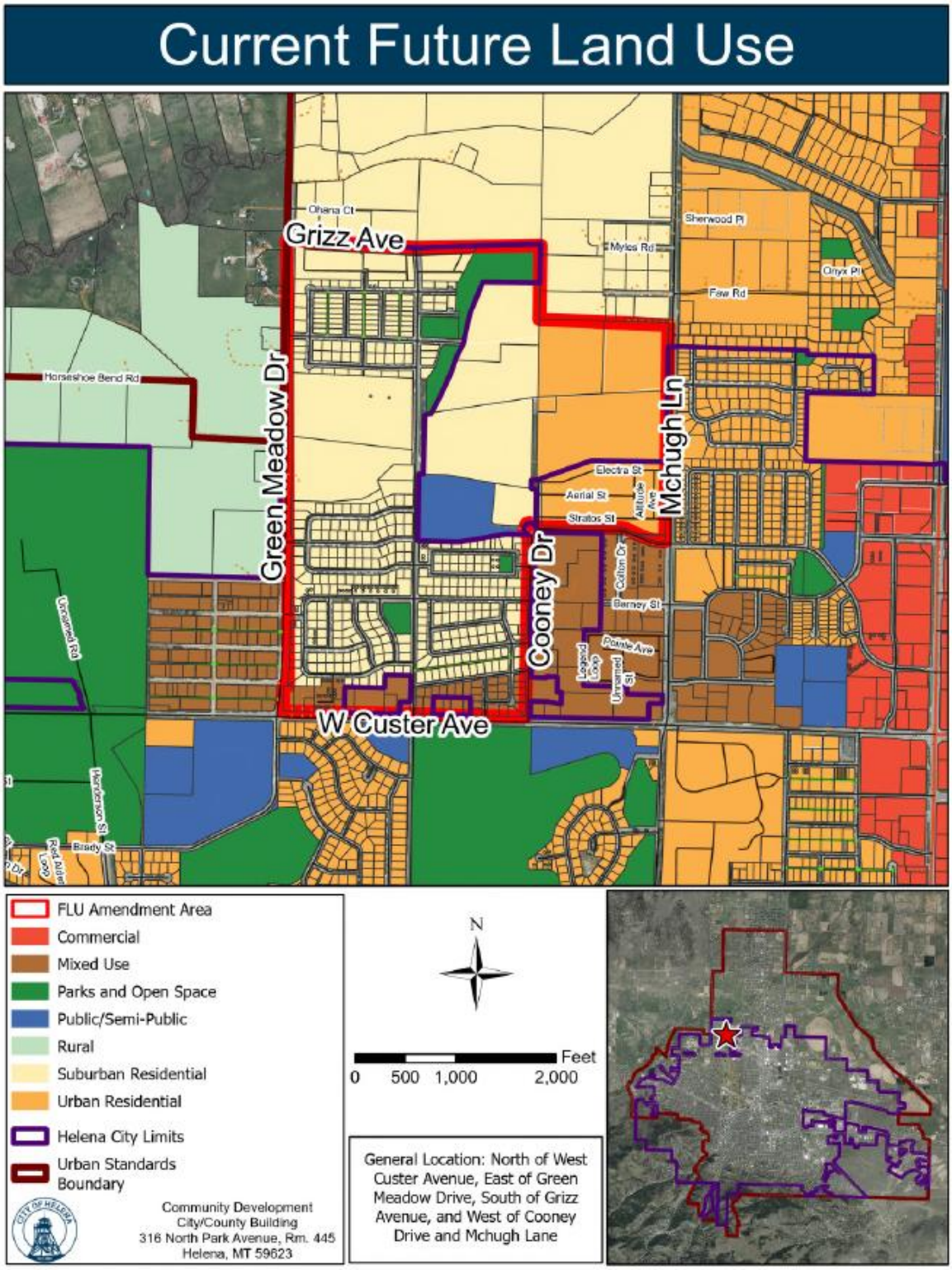
1. **Move to make a preliminary determination that there are no new or increased impacts associated with proposed Land Use Plan land use element amendments.**
2. **Move to make a preliminary determination that there are no new or increased impacts associated with the proposed Future Land Use Map amendments.**
3. **Move to approve a recommendation to amend the 2025 Land Use Plan.**
4. **Move to approve a recommendation to amend the 2025 Future Land Use Map.**

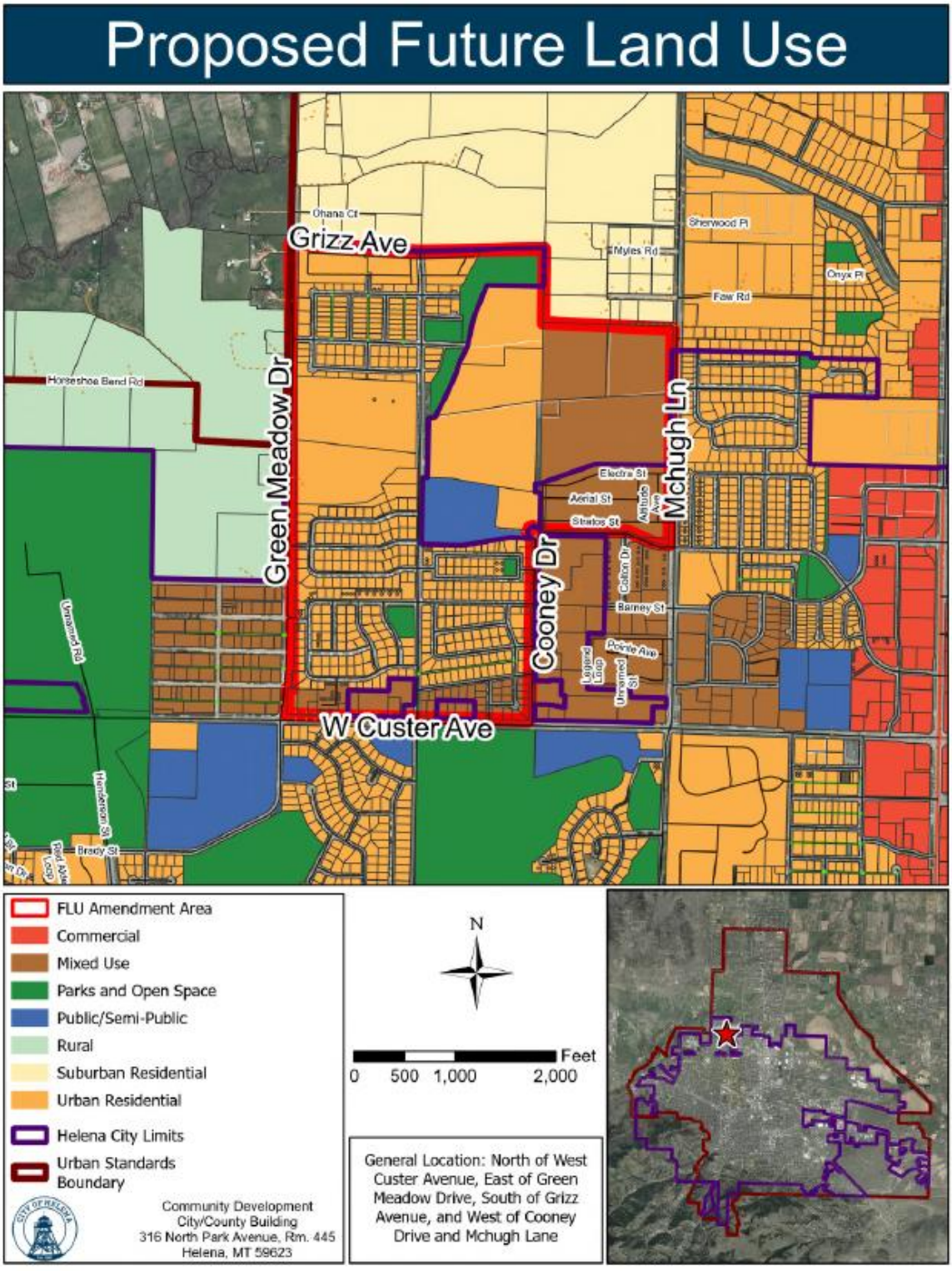
Staff Recommendations for the City Commission:

1. **Move to approve a Resolution of Intention to amend the 2025 Helena Forward Land Use Plan and Future Land Use Map.**
2. **Move to approve a Resolution amending the 2025 Helena Forward Land Use Plan and Future Land Use Map.**

Appendix A –Maps




Current Future Land Use
Grizz Ave
Green Meadow Dr
Mchugh Ln
Cooney Dr
W Custer Ave
Olivera Ct
Sherwood Pl
E Myles Rd
Onyx Pl
Few Rd
Horseshoe Bend Rd
Electra St
Aerial St
Stratos St
Altitude Ave
Cotton Dr
Barney St
Pointe Ave
Legend Loop
Unnamed St
Lockwood Rd
Hardscrog St
Brady St
Red Rider Loop
FLU Amendment Area
Commercial
Mixed Use
Parks and Open Space
Public/Semi-Public
Rural
Suburban Residential
Urban Residential
Helena City Limits
Urban Standards Boundary
Community Development
City/County Building
316 North Park Avenue, Rm. 445
Helena, MT 59623
N
Feet
0 500 1,000 2,000
General Location: North of West Custer Avenue, East of Green Meadow Drive, South of Grizz Avenue, and West of Cooney Drive and Mchugh Lane


Proposed Future Land Use
Grizz Ave
Green Meadow Dr
Mchugh Ln
Cooney Dr
W Custer Ave
Ohana Ct
Myles Rd
Sherwood Pl
Onyx Pl
Faw Rd
Horseshoe Bend Rd
Electra St
Aerial St
Stratos St
Altitude Ave
Colton Dr
Barney St
Pointe Ave
Legend Loop
Unnamed St
Unnamed Rd
Henderson St
Brady St
FLU Amendment Area
Commercial
Mixed Use
Parks and Open Space
Public/Semi-Public
Rural
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316 North Park Avenue, Rm. 445
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0 500 1,000 2,000
General Location: North of West Custer Avenue, East of Green Meadow Drive, South of Grizz Avenue, and West of Cooney Drive and Mchugh Lane

Appendix B – Public Meeting Notes & Sign-in Sheets

FLUM Amendment Meeting

OUR REDEEMER'S LUTHERAN CHURCH, OCTOBER 20, 2026, 5:30PM

What follows below are a series of notes taken by City Staff in the course of an approximately 2-hour meeting held at Our Redeemer's Lutheran Church on Benton Avenue on October 20, 2026. The topic of the discussion was the proposed Future Land Use Map amendments affecting properties within two district areas, considering increasing proposed density levels and the intensity of future land uses that may arise with new developments. The meeting was attended by 68 participants, and staff led off the meeting with a presentation on what was being proposed for the amendments.

1. The first community member was (1) trying to get a clearer sense of what the City was looking to undertake; (2) understand the underlying zoning in the amendment areas; and (3) express frustrations over purchasing homes in areas zoned R-2 (Residential) that could see a density increase as compared with what they assumed when buying property years ago.
    a. Staff restated the project purpose and need for their presentation, responded to specific zoning questions, and noted that existing zoning affords for higher density (two or more units by-right in all residential districts) in proposed amendment areas than what may be built out, presently. Staff also reiterated that the FLUM is a policy tool and not regulatory in nature, as is true of zoning and its associated standards.
2. The second community member raised questions over how West Custer Avenue will handle the increase in density when it already has issues supporting current transportation needs.
    a. Staff spoke to the need to review traffic impacts associated with all proposed developments that may exceed 200 vehicle trips per day (VPD) or subdivisions through a Traffic Impact Study. Staff also provided information on the existing and draft Long Range Transportation Plan (LRTP) and how the LRTP prioritizes projects to address such issues, encouraging participants to comment on the draft 2026 LRTP.
3. The third community member commented that infrastructure seems to be an afterthought by the City, as evidenced by allowing 240 units to be constructed in the Aero Vista's development prior to increasing transportation infrastructure.
    a. Staff spoke to the history of the Aero Vista's development and the infrastructure requirements the developer is required to address, such as transportation impacts and other Public Works infrastructure concerns. Staff also commented

on the City's firm stance in applying/enforcing its adopted Engineering and Design Standards as well as its Complete Streets Policy and the Public Right-of-Way Access Guidelines (PROWAG).

4. The fourth community member also commented that the City is allowing large developments to occur without improving Custer Avenue.
    a. Staff reiterated comments shared above with respect to comment 3.
5. The fifth community member commented that the FLUM adopted in 2025 meets current land uses between Cooney Drive and Green Meadow Drive. Why change that now?
    a. Staff responded that they disagree that the adopted FLUM meets current land uses and densities as there are a large number of multifamily housing properties and a commercially zoned tract in the area as well as build-out at a higher level of density than is typically seen in Suburban Residential. Staff also spoke to how, prior to the 2025 FLUM adoption, previous FLUMs in the 2019 and 2013 Growth Policies (and possibly prior to that) showed all the FLUM amendment areas being discussed at the meeting designated as Mixed Use. The earlier definition of the Mixed Use designation, further, was far broader, in capturing the ability to have commercial and light manufacturing uses in the area.
6. The sixth community member stated that most of the FLUM amendment area is comprised of single-family residential uses.
    a. Staff concurred that much of the area is single-family residential, but that there are a large quantity of properties that are two or more dwelling units per parcel, including multi-family rentals and some owner-occupied condominiums. Additionally, all residential zoning districts allow for limited nonresidential uses, and noted that there is even a pocket of B-1 (Neighborhood Business) along Green Meadow Drive. While single-family residential may be predominant, density is high in many areas, like Stone Meadows and the Green Meadow Subdivision, on a unit per acre basis. Further, the City has no single-family zoning to preclude adding additional dwelling units on existing lots and that accessory dwelling units (ADUs) are allowed by-right under state law.
7. The seventh community member commented that many FLUM amendment area residents were told by realtors they would be living in single family-exclusive areas, and now there is a great deal of multifamily housing built around them, causing people to park all along the street with nowhere for firetruck access.
    a. Staff noted that, while they could not speak to historic development proposals as compared with what was ultimately developed along streets like Travertine Way and Andesite Avenue, what exists is by-right and in compliance with adopted regulations. With respect to street widths, staff noted the difference

with public right-of-way standards as compared with private streets, like those installed in the past in the Green Meadow Subdivision. Staff reiterated the firm stance being taken in the application of City Engineering and Design Standards with newer developments, in part reflecting lessons learned in allowing substandard streets in areas of the City.

8. The eighth community member purchased their single-family home, but they are displeased that their property is in an R-4 (Residential-Office) district that allows multiple dwelling units.
    a. Staff clarified that, at the time the Stone Meadows Subdivision was being developed, R-4 was the most generous district for district dimensional standards like lot coverage and height, while also allowing for multi-family residential and compatible nonresidential uses.
9. The ninth community member commented that the fact that Green Meadow Drive is under MDT jurisdiction does not help alleviate transportation related issues.
    a. Staff affirmed that Green Meadow Drive is indeed Montana Department of Transportation and, therefore, the City lacks control over access being granted onto that right-of-way for new east-west connections.
10. The tenth community member asked how the proposed FLUM amendments will affect taxes.
    a. Staff stated that there is not a knock-on effect between the proposed FLUM amendment policy change and property taxes.
11. The eleventh community member asked how the Urban Residential designation will help create a more walkable environment and wondered whether the change would mean developers would be able to build more commercial destinations to walk to.
    a. Staff responded that the City has a Complete Streets Policy and Engineering and Design Standards to ensure that walkability is addressed in developments and restated from the presentation that Urban Residential does also encourage mixed use neighborhoods that allow for compatible commercial uses (ex: small-scale retail, cafes, professional offices, and personal services).
12. The twelfth community member asked how current zoning and land use designations may affect the Our Redeemer's Lutheran Church property.
    a. Staff indicated that the current FLUM designation, as applies to the church property, does not align with their latest development proposal, and they will still be required to consider a rezoning of their property if they wish to develop future higher-density housing in the future after the proposed FLUM amendment is adopted.
13. The thirteenth community member remarked that their key issue pertains to transportation. Their concern was that changing the designation to Urban Residential

will only make things worse when it comes to transportation because there are not enough east and west connections.

   a. Staff reiterated responses previously made regarding assessments of transportation impacts with new developments or land use proposals as well as some of the east-west connections being installed now and called out in the LRTP.

14. The fourteenth community member commented that it is important to keep in mind that zoning and platting processes impact the installation of transportation improvements.
   a. Staff clarified that it depends based on the development proposal and submitted applications, if there are any, but that transportation must be—and is—considered regardless.
15. The fifteenth community member stated that they were unclear of what the future land use proposal was, questioning whether the City is proposing to change the Suburban Residential area to Mixed Use or Urban Residential.
   a. Staff clarified that the City is proposing to change the first area (bordered by Custer, Green Meadow, Grizz Ave., and Cooney Drive) to Urban Residential and the parcels east of Cooney, west of McHugh, north of Roadrunner, south of the to-be-changed Lander Road to Mixed Use.
16. The sixteenth community member wished to clarify what we meant with the designation of "Public/Semi-Public."
   a. Staff restated the designation from the Land Use Plan provided in the meeting handout for participants, and stated that it does include uses like schools, churches, and non-profits.
17. The seventeenth community member stated that they were a proponent of affordable housing and a sustainable community. They believe that the community needs to work towards accepting greater density in order to meet affordability in housing. They commented that a third of the community spends more than 35% of gross income on housing costs alone.
18. The eighteenth community member remarked that one of their children needed to pay $1700 for a 2-bedroom apartment in Helena, and the lack of affordability in Helena pushed them to move to Great Falls.
19. The nineteenth community member shared that one of the things that meeting participants and the wider community needed to remember to focus on is that the FLUM defines how things will be developed. The City has transportation, parks, wastewater, water treatment, and parks long-range plans, all of which rely on a future land use designation. The commenter understood the impacts of neighborhoods changing and could appreciate higher density impacts for residents. Fundamentally, smaller lots allow for smaller and more affordable houses, and different people want

different things at different stages in their lives. They also noted that the areas under consideration for a FLUM amendment used to be designated Mixed Use because the area was already developed with mixed uses of single-family residential and multifamily residential uses in 2019 and 2013. In their view, this is the way the city is growing, and they commended the City in recognizing we need to make these changes. They would like to impress upon the community to continue with open communication, interaction, and participation throughout the process.

20. The twentieth community member asked whether the comments from the meeting are going to have any real impact and this planning decision moving forward.
    a. Staff responded that the Planning Commission and City Commission will be receiving and taking all comments made in the course of the meeting—and beyond—into consideration in their deliberations as they make their determinations on the proposed amendments. Staff encouraged participants to continue to engage and provide comments, as may be necessary, as the process continues through the public hearing process.
21. The twenty-first community member provided comments on behalf of the United Way of the Greater Helena Area, giving context for the affordability crisis that exists in Helena. Their comments, made in writing, are being provided as an addendum to these meeting minutes.

United Way of the Lewis and Clark Area Comments, presented by Jeff Buscher, Community Impact Coordinator

CURRENT STATS

Average Home Price in Lewis & Clark Co. > $512,783

2.9% increase this year. > 314 homes for sale

Current Average Rental > $1663 – 2026 up 2% this year

4.9% rental vacancy rate

41% of renters pay more than 30% of their income > rent burdened

Hourly rate needed to afford average rent. - $32.00

2020-2026 66.9% increase rent costs LC County

2020-2026 47% increase in purchase costs LC County

Stories...
Theresa... New Employee
Jamie... has lived in her van for over 6 years
Steve... unsheltered for more than 30 years

Without recounting the Federal Decisions made going back to the Reagan Years that have led us to the current lack of affordable housing, I want to remind us all, that we did not get into this situation overnight and it will take years to rebuild the housing stock that provides affordable homes for first time home buyers, and neighbors who may be trying to get by on a minimum wage. Providing a variety of housing options, that include higher density settings – Is a step in the right direction toward making the corrections needed in our community.

FLUM Amendment Meeting
Tuesday, October 20, 2026 5:30 PM
Sign-In Sheet

PLEASE PRINT

Name	Address	E-mail
Charlene Mayala	1827 Harrison	csmayala66@gmail.com
Jerry Hoover	2025 Flowerree	jerry.r.hoover@gmail.com
NORMAN H. GUEVIN	94 COLTERCOOP DR	harley in me@outlook.com
Morgan Guevin	94 Colter Loop Dr	guevinfamily@outlook.com
Bethalee Schayen	251 Flagstone Ave	bschayen0928@gmail.com
Alyssa Lanz	301 Obsidian Ave	alyssalanz3@gmail.com
Allen Cormany	3759 Traventine Way	acormany76@gmail.com
Sharlene Kolb	610 Glendale St.	Kolb5585@msn.com
Tom Wargelin	2737 Faron AVE	tomwargelin@gmail.com
Phyllis Michelson	2737 Faron AVE	"
Janet Benson	250 Norris Rd	jhb.brokenspurranch@gmail.com
Byron Beley	211 springfield Dr.	byronbeley@gmail.com
Pat Keim	1350 Deer Meadow Dr	pkeim1350@gmail.com
Jay Lucht	460 Paron St	jllucht68@gmail.com
Julie Peck	263 Obsidian	juliepeck53@gmail.com
Darbie M Hess	429 Raymond St	darbie.hess@gmail.com
Charlotte Neill	2225 Alpine Dr. 3D	cneillcooke@lutheran.edu
Jim Penner	1601 Highland St	jamespenner@gmail.com
MaryKay Linke	419 Fountain Ct	grizlinke@gmail.com

FLUM Amendment Meeting
Tuesday, October 20, 2026 5:30 PM
Sign-In Sheet

PLEASE PRINT

Name	Address	E-mail
Arthur Taylor	293 Westwind Way	arthur_j_taylor@yahoo.com
Herb Kulow	1413 Cole Ave Helena	herbkulow@gmail.com
Tami Ellis	130 Briarwood Ln	Elliscfam22@gmail
GRETCHEN KRUMM	905 HAYES AVE.	bgkrumm@gmail.com
Carson Yahvah	423 Barney St.	carson.yahvah@gmail.com
Ben & Tracey Tintinger	61 So Benton	bptinger@bresnan.net
BONNER & Karen Armstrong	1352 Beaverhead Road	bonnerarmstrong@gmail.com
Blair Krumm	905 Hayes	bgkrumm@gmail.com
Ingrid Childress	435 Peyton St	ichildressllcc@gmail.com
SHAWN HIGLEY	287 OBSIDIAN	shigley@jwkengineering.com
Miranda Gehris	415 Grizz AVE	Miranda_gehris@hotmail.com
Jan Martin	1431 Flowerree	jonwallymt@gmail.com
Jeff Martin	1431 Flowerree	jmart0787@gmail.com
CHARLIE GORMAN	1873 WOOTEN RD	CEGORMAN3@GMAIL.COM
Del Schubring	3212 Dunlap	d-aschub@hotmail.com
Theresa Rivers	430 Parriman St.	helenatj56@gmail.com

FLUM Amendment Meeting
Tuesday, October 20, 2026 5:30 PM
Sign-In Sheet

PLEASE PRINT

Name	Address	E-mail
Dennis & Dodie Heffner	1360 Bighorn Road ~~[illegible]~~	dheffner98@AOL.com
Georg[illegible] Cleves	365 Brookfield dr.	Mango7340@Yahoo.Com
Larry + Julie, Boschee	328 Northgate loop	N/A
Sharon Naugle	5 Hummingbird Cir	shaugenshaun74@gmail.com
JUDY BECK	3270 Gateway Dr	jmb3800@gmail.com
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Attila Folnagy	2500 National Ave	attilafolnagy@gmail.com
Kim Warren	8730 Green Meadow	Kwarren583@Gmail.com
Cassie Warren	235 Obsidian Ave	cassiewarren10@gmail.com
Allen Chambers	352 Obsidian Ave	glchambers@aol.com
Dorothy & Tim Cail	3517 Canyon Ferry	~~[illegible]~~ tcail1949@gmail
Pastor Tina Johnston	3580 N Benton Ave	tjohnsten@msn.com
Nancy - Tom Bowe	319 Obsidian	tbowe406@gmail.com
Kenneth Kolb	610 Glendale	N.A
Bob Moler	3710 Talc Way	robertmoler@gmail.com
Dennis Trotter	Bull Mountain Heights Dr	dennistrotter@me.com

Travis Goodrich

From: Alyssa Lanz <alyssalanz3@gmail.com>
Sent: Thursday, October 29, 2026 11:16 AM
To: Ellie Ray; Travis Goodrich; Casey Jessee; Alyssa Lanz
Subject: Oppose Growth Policy Amendment for Stone Meadows Neighborhood

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from alyssalanz3@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

CITY OF HELENA – GROWTH POLICY AMENDMENT

Request to Retain the Suburban Residential Land Use Designation

Date: October 29, 2026

To: City of Helena Planning Division, Planning Commission, and City Commission

Re: Opposition to Proposed Future Land Use Map Amendment – Area North of Custer Avenue Between Green Meadow Drive and Cooney Drive

Dear City Officials:

We are property owners in the area north of Custer Avenue between Green Meadow Drive and Cooney Drive in Helena, Montana. We are writing to express our **opposition to the proposed change in the City's Growth Policy Future Land Use Map from Suburban Residential to Urban Residential** for this area.

We recognize the need for additional housing and responsible growth in Helena. However, we believe the proposed land use change is inconsistent with the existing character of our neighborhoods and could encourage development that is not compatible with surrounding residential properties.

Our primary concerns are as follows:

1. Existing Neighborhood Character: Our neighborhoods consist predominantly of established single-family homes, private yards, and one- and two-story residences. The City's Suburban Residential designation accurately reflects this existing development pattern. Changing to Urban Residential would encourage substantially higher-density development, including large, multistory apartment buildings.

2. Existing Zoning Versus Actual Development: Although much of the area is currently zoned R-3, it has been developed primarily as lower-density, single-family residential housing. The existing zoning designation should not, by itself, justify changing the Future Land Use Map. Planning decisions should consider how neighborhoods have actually developed.

3. Significant Increases in Density: Existing residential density in the surrounding neighborhoods is estimated at approximately four dwelling units per acre. Proposed multifamily development in the area illustrates the potential for densities of approximately 24 units per acre—**six times the existing**

October 20, 2026 - Public Meeting Comments
Proposed Growth Policy Amendment – Suburban Residential to Urban Residential
Area North of Custer Avenue Between Green Meadow Drive and Benton Avenue

Shawn Higley, P.E. – Area Property Owner and Professional Engineer

Introduction

Good evening. My name is Shawn Higley. I am a property owner in the affected area and a licensed professional engineer with more than 30 years of experience in land development, municipal infrastructure, and residential and commercial development throughout Montana.

I appreciate the opportunity to comment on the City's proposed amendment to the Future Land Use Map, which would change the designation of our neighborhood from Suburban Residential to Urban Residential.

I recognize that Helena needs additional housing and that responsible growth is important to the community. However, I have significant concerns about changing the long-term land use designation of an established residential neighborhood in a manner that would encourage substantially higher-density development.

My primary concern is that the City appears to be basing this proposed change largely on existing R-3 zoning rather than the actual development pattern, density, and character of our neighborhood.

Although much of the area is zoned R-3, it has been developed predominantly as single-family residential, at densities more consistent with R-2 or lower-density development. There is a significant difference between what zoning may allow and what has actually been developed.

The Growth Policy should recognize that difference rather than use the existing zoning designation as justification for fundamentally changing the future character of our neighborhoods. There is an old saying that holds very true in this case: "**If it isn't broken, don't fix it**". I would like to address six specific concerns as follow:

1. Existing Neighborhood Character Versus Existing Zoning

- **Existing development:** The area north of Custer Avenue between Green Meadow Drive and Benton Avenue consists predominantly of established single-family

residential neighborhoods, with detached homes, individual yards, and relatively low residential densities.

- **Existing zoning:** Although much of the area is zoned R-3, the actual development pattern is more consistent with R-2 or lower-density residential development.
- **City zoning definitions:** Helena's zoning ordinance identifies R-1 and R-2 districts as primarily intended for lower-density residential development, while R-3 accommodates a broader mixture of residential structures.
- **Zoning versus actual land use:** The fact that a neighborhood is zoned R-3 does not mean it has developed at the densities or building heights associated with Urban Residential land use.
- **Existing density:** The surrounding neighborhoods have an estimated residential density of approximately four dwelling units per acre, which is consistent with lower-density suburban residential development.
- **Importance of existing development:** The City's Growth Policy should consider the actual development pattern, neighborhood character, and infrastructure conditions rather than relying primarily on the theoretical development potential of existing zoning.

The distinction is important. Our neighborhood may be zoned R-3, but it has been built and functions as a lower-density, single-family residential neighborhood. The Future Land Use Map should reflect that reality.

2. Suburban Residential Versus Urban Residential Land Use

The City's own land use classifications demonstrate why this proposed amendment is significant.

- **Suburban Residential:** The City's land use framework describes Suburban Residential as lower-density residential areas that primarily accommodate detached single-family homes. These areas provide a transition between more intensely developed urban neighborhoods and rural land.
- **Urban Residential:** The City's framework describes Urban Residential as areas intended to accommodate moderate- to high-density residential development, including townhomes, duplexes, triplexes, and multifamily developments of three or more stories.

- **Fundamental difference:** These classifications represent substantially different development patterns. Suburban Residential emphasizes lower density and detached housing, while Urban Residential encourages a broader range of housing types and substantially greater development intensity.
- **Existing neighborhood characteristics:** Our neighborhoods closely match the City's description of Suburban Residential. They consist primarily of detached single-family homes, private yards, lower building heights, and relatively low residential densities.
- **Proposed change:** Changing the designation to Urban Residential would establish a long-term planning framework that supports significantly higher-density development than currently exists.
- **Future development implications:** Although a Growth Policy amendment does not automatically change zoning or authorize apartment construction, it would establish a planning basis for future zoning changes and development proposals involving substantially greater residential intensity.

The City's own definitions describe our existing neighborhoods as Suburban Residential. I question why the City would change that designation to Urban Residential when the existing development pattern has not changed.

3. Potential for Significant Increases in Residential Density

- **Existing neighborhood density:** The established single-family neighborhoods have an estimated density of approximately four dwelling units per acre.
- **Example of future development intensity:** The proposed development on the Our Redeemer's Lutheran Church property includes 236 apartment units on approximately 9.85 acres, representing 24 dwelling units per acre.
- **Sixfold density increase:** The church development illustrates the potential magnitude of future development under an urban residential pattern. Its proposed density is approximately six times the estimated density of the surrounding neighborhoods.
- **Building height:** The church proposal includes three four-story apartment buildings, which are substantially different from the predominantly one- and two-story homes in the surrounding area.

- **Neighborhood compatibility:** Introducing development at six times the existing density raises significant concerns regarding building scale, privacy, traffic, parking, and the overall character of established residential neighborhoods.
- **Broader implications:** The proposed Growth Policy amendment is not limited to the church property. It would establish an Urban Residential designation for a larger area, potentially influencing future redevelopment and rezoning requests throughout the neighborhood.
- **Long-term consequences:** Once the Future Land Use Map identifies this area for urban residential development, future proposals for substantially higher densities may be considered consistent with the City's adopted planning objectives.

The proposed church development illustrates why this land use change matters. We are looking at the potential for development densities six times greater than what currently exists. That is not a minor change in neighborhood character, but will substantially change it.

4. Transportation and Infrastructure Limitations

From my professional engineering perspective, transportation is one of the most significant concerns associated with increasing the planned residential density of this area.

- **Existing roadway network:** The neighborhoods are served primarily by Green Meadow Drive and Benton Avenue, with both connecting to Custer Avenue to the south.
- **Existing intersection conditions:** Based on previously reported traffic studies:
    - Green Meadow Drive/Custer Avenue operates at **Level of Service F (failing)**.
    - Benton Avenue/Custer Avenue operates at **Level of Service D (failing)**.
    - Custer Avenue is currently inadequate for existing traffic circulation **(failing)**.
- **Existing congestion:** These reported conditions indicate significant traffic delays and limited operating capacity at intersections that serve the surrounding neighborhoods.
- **Potential additional traffic:** As an example, the proposed 236-unit church development could generate approximately 1,200 to 1,650 additional vehicle trips per day, based on preliminary multifamily residential trip-generation assumptions.

- **Impacts of higher-density development:** Changing the entire area to Urban Residential could encourage additional multifamily development and redevelopment, resulting in cumulative traffic increases beyond those associated with any single project.
- **Intersection capacity:** When intersections are already operating near or beyond capacity, additional traffic can produce disproportionately large increases in delays and vehicle queues.
- **Infrastructure planning:** Before identifying an established neighborhood for substantially greater residential density, the City should evaluate whether the existing transportation network can reasonably accommodate that growth.
- **Cumulative impacts:** The Growth Policy should consider the combined impacts of potential future developments rather than relying solely on traffic studies prepared for individual projects.
- **Public infrastructure:** Increased residential density would also create additional demands on water distribution, wastewater collection, stormwater management, emergency access, and other public services.

As an engineer with significant experience in land planning, I question the planning rationale for designating an area for substantially higher-density development when the existing transportation network already experiences significant operational deficiencies.

The Growth Policy should be coordinated with infrastructure capacity and long-term transportation planning, not simply based on existing zoning classifications.

5. Long-Term Planning, Neighborhood Compatibility, and Development Precedent

- **Purpose of the Growth Policy:** The Future Land Use Map should establish a coordinated vision for how Helena develops over time, considering existing land uses, neighborhood characteristics, infrastructure, and future community needs.
- **Actual development pattern:** Our neighborhood has developed primarily as lower-density, detached single-family residential housing. That established development pattern should be a significant consideration in determining its future land use designation.

- **Consistency with surrounding uses:** Changing the area to Urban Residential would create a planning framework that encourages substantially greater residential intensity than currently exists.
- **Lack of transition:** The proposed amendment does not appear to establish a meaningful transition between existing lower-density neighborhoods and areas where higher-density residential development may be appropriate.
- **Future rezoning implications:** Although the land use amendment would not immediately change existing zoning, it could be used to support future requests for higher-density zoning and multifamily development.
- **Cumulative redevelopment:** Over time, individual redevelopment projects could gradually change the character of the neighborhood, even if each project is considered separately.
- **Infrastructure considerations:** The City should identify the transportation, utility, and public service improvements necessary to support the development intensity contemplated by an Urban Residential designation.
- **Alternative planning approach:** Maintaining the Suburban Residential designation would better reflect the established neighborhood character while still allowing appropriate residential development consistent with applicable zoning and development standards.

In my experience, good land use planning should be based on a logical progression of development intensity, compatibility with existing neighborhoods, and the capacity of supporting infrastructure.

The presence of R-3 zoning alone **DOES NOT** provide sufficient justification for changing an established single-family neighborhood from Suburban Residential to Urban Residential.

6. Public Involvement and the Need for a Clear Planning Justification

- **Long-term community implications:** The proposed Growth Policy amendment would influence the future development of an established residential area for many years. The decision should consider the long-term interests of the entire community.
- **Importance of neighborhood input:** Residents who live in the affected area have direct knowledge of existing traffic conditions, neighborhood characteristics,

drainage concerns, and other issues that should inform the City's planning decisions.

- **Basis for the proposed amendment:** The City should clearly explain why an Urban Residential designation is appropriate when the existing development pattern is predominantly lower-density, detached single-family residential.
- **Zoning is only one consideration:** Existing R-3 zoning should not be the sole or primary justification for changing the Future Land Use Map. Actual development patterns, infrastructure capacity, and compatibility with surrounding neighborhoods should also be evaluated.
- **Evaluation of alternatives:** The City should consider retaining the Suburban Residential designation for established single-family neighborhoods while evaluating whether Urban Residential is appropriate for specific undeveloped properties or locations better suited to higher-density development.
- **Infrastructure planning:** Before adopting a designation that encourages substantially greater residential density, the City should identify the infrastructure improvements that may be necessary to support that growth.
- **Transparency in decision-making:** The City should document the planning rationale for the proposed amendment and explain how the change advances the Growth Policy's objectives while addressing neighborhood compatibility and infrastructure limitations.

A change of this magnitude should be supported by a clear planning justification that considers the actual character of the neighborhood, the capacity of existing infrastructure, and the long-term consequences for surrounding property owners.

Closing Comments

I recognize the need for additional housing in Helena, and I understand that the City must plan for future growth. However, growth should be directed to appropriate locations based on existing land uses, neighborhood compatibility, transportation capacity, and available infrastructure.

The area north of Custer Avenue between Green Meadow Drive and Benton Avenue has developed predominantly as a lower-density, single-family residential neighborhood. Although much of the area is zoned R-3, **the actual development pattern is consistent with the City's definition of Suburban Residential.** Changing the Future Land Use

designation to Urban Residential would establish a planning framework that encourages substantially higher residential densities and larger multifamily buildings.

The proposed church development illustrates the potential consequences, with 236 apartments at approximately six times the estimated density of the surrounding neighborhoods. This change would also place additional development pressure on a transportation network where key intersections already experience significant congestion.

From my perspective as both a property owner and a professional engineer experienced in land development, I do not believe the existing R-3 zoning designation, by itself, provides adequate justification for changing the long-term land use designation of our established neighborhoods.

The City appears to be using the existing R-3 zoning to justify changing the Future Land Use designation to Urban Residential. I believe that reasoning is backward. The Growth Policy should establish the community's vision for future development based on existing land use, neighborhood character, infrastructure capacity, and appropriate growth patterns. It should not simply assume that because an area is zoned R-3, it should be designated for substantially higher-density urban development.

The Growth Policy should reflect how our neighborhoods have actually developed, not simply the maximum intensity that existing zoning might allow.

I respectfully request that the City retain the Suburban Residential designation for the established residential neighborhoods north of Custer Avenue between Green Meadow Drive and Benton Avenue.

If the City believes a different designation is warranted for a particular undeveloped property, that area should be evaluated separately based on its specific characteristics, surrounding uses, and infrastructure capacity rather than changing the designation of the entire neighborhood. **We can accommodate future housing needs without fundamentally changing the character of established residential neighborhoods**.

Thank you for considering my comments.

Sincerely,

Shawn Higley, Landowner
287 Obsidian Avenue

neighborhood density. Such a substantial increase could significantly change the character of our neighborhoods.

4. Traffic and Public Safety: Green Meadow Drive, Benton Avenue, and their intersections with Custer Avenue already experience traffic congestion. Encouraging substantially higher-density residential development could increase traffic delays, affect neighborhood streets, and create additional public safety concerns.

5. Public Infrastructure: Higher-density development would increase demands on existing roads, water and sewer systems, stormwater facilities, and emergency services. The City should evaluate the capacity of these systems before designating established neighborhoods for substantially greater development intensity.

6. Long-Term Planning and Compatibility: The Growth Policy should provide a coordinated vision for future development that respects established neighborhoods and considers infrastructure capacity. Changing this area to Urban Residential could support future rezoning and redevelopment proposals that substantially alter the existing neighborhood character.

REQUESTED ACTION

We respectfully request that the City of Helena retain the Suburban Residential Future Land Use designation for the established residential neighborhoods north of Custer Avenue between Green Meadow Drive and Cooney Drive.

We support responsible growth and additional housing in Helena, but believe that future development should be compatible with existing neighborhoods and supported by adequate public infrastructure.

Thank you for considering our comments.

Sincerely,

Alyssa Lanz and Casey Jessee

301 Obsidian Avenue Helena, Montana 59602

Travis Goodrich

From: Thomas <tbowe406@gmail.com>
Sent: Thursday, October 29, 2026 1:01 PM
To: Ellie Ray; Travis Goodrich
Subject: Opposition to Land Use Map Amendment

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from tbowe406@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear City Officials:

For the past 8 years we have lived in our single-family home located north of Custer and between Benton and Green Meadow. We oppose the proposal to change the map from Suburban Residential to Urban Residential.

Our neighborhood is primarily low-density residential. The land use map should reflect how the neighborhood has already been developed. Any future increase in residential density would be a major change and increase the traffic and parking congestion that already exists.

We request that the existing Suburban Residential Land Use designation be retained for our neighborhood. Thank you for your consideration.

Thomas and Nancy Bowe
319 Obsidian Ave
Helena, MT 59602-8667

Column

OFFICIAL AD PROOF

This is the proof of your ad scheduled to run in **Helena Independent Record** on the dates indicated below. If changes are needed, please contact us prior to deadline at **(123) 456-7890**.

Notice ID: JhtsKzNxb3uy4CAjSm8i | **Proof Updated: Oct. 21, 2026 at 11:12am MDT**
Notice Name: Helena Planning Commission Public Hearing | Publisher ID: COL-MT-203361

See Proof on Next Page

This is not an invoice. Below is an estimated price, and it is subject to change. You will receive an invoice with the final price upon invoice creation by the publisher.

FILER	FILING FOR
Ellie Ray eray@helenamt.gov (406) 447-8000	Helena Independent Record

Columns Wide:	2	**Ad Class:**	Legals
Total Column Inches:	12.3		
Number of Lines:	54		

10/24/2026: General Legal Notice	42.00
10/31/2026: General Legal Notice	36.00
Subtotal	$78.00
Tax	$0.00
Processing Fee	$0.00
Total	**$78.00**

Helena Planning Commission Public Hearing

The City of Helena Planning Commission will hold a public hearing at **6:00 p.m. on Tuesday, November 10, 2026,** in the Commission Chambers, Room 330 of the City-County Building, 316 North Park Avenue, Helena, Montana and on Zoom at https://us02web.zoom.us/j/86405617150 , to consider the following proposal:

Consideration of a Resolution to amend the 2025 Helena Forward Land Use Plan and Future Land Use Map.

The Planning Commission will accept, consider, and respond to all written and oral comments received up to and during the public hearing. For more information or to submit written comments in advance of the hearing, contact: Ellie Ray, Community Development Department, City of Helena, 316 N. Park Avenue, Room 404, Helena, MT 59623, 406-447-8490 or 406-447-8491 or email eray@helenamt.gov .

The Helena Forward Land Use Plan and Future Land Use Map amendments are tentatively scheduled for consideration by the Helena City Commission as follows:

Resolution of Intention
Monday, December 7, 2026
City Commission Chambers
City-County Building, Room 330
316 N. Park Avenue
Helena, Montana

Resolution Adoption
Monday, December 21, 2026
City Commission Chambers
City-County Building, Room 330
316 N. Park Avenue
Helena, Montana

Virtual Meeting Option : Zoom: https://zoom.helenamt.gov/c/36053471/publicmeetings
Please note that the these City Commission hearing dates are tentative and subject to change. Interested persons should confirm the meeting dates and review the posted agendas on the City of Helena website prior to the meeting.

Persons with disabilities requiring accommodations to participate in the City's meetings, services, programs, or activities should contact the City's ADA Coordinator as soon as possible to allow sufficient time to arrange for the requested accommodation, at any of the following: Phone: (406) 447-8490; TTY Relay Service 1-800-253-4091 or 711; Email: Citycommunitydevelopment@helenamt.gov; Mailing Address & Physical Location: 316 North Park, Avenue, Room 445, Helena, MT 59623.
October 24, 31, 2026 COL-MT-203361 **MNAXLP**