



Cascade County Planning Department  
121 4<sup>th</sup> Street North, Suite H/1  
Great Falls, MT 59401

April 25, 2019

Dear Planning Department:

It is appropriate that you are discussing the timely update of the 2014 Cascade County Growth Policy. It is interesting how even the best future planning needs to be modified or changed. This is a perfect time for the Growth Policy update prior to any potential zoning changes.

Also, to provide substantial public participation in this important process, it may be important to take meetings to the people in the outlying communities and rural areas and schedule a larger venue and later time for Great Falls. Utilizing only online input certainly has disadvantages. Public conversation enriches the future vision and allows consensus to more easily be reached.

There should be no great hurry to complete a thorough review with plenty of public input prior to resuming any possible zoning changes.

Perhaps the May 21<sup>st</sup> meeting could be a starting point for establishing venues for public participation in the Growth Policy update process.

Thank you for considering these recommendations.

Sincerely,



Arlyne Reichert  
Delegate, Montana Constitutional Convention  
Former Montana State Legislator  
1409 Fourth Avenue South  
Great Falls, MT 59405

cc: Cascade County Commissioners Larsen, Weber, Briggs

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4/30/2019

Public Comment from Deborah and Mike Jenkins, 298 Hastings Road

1. We are pleased that you have listened to the public's request that you follow protocol and review the Cascade County Growth Policy now, and before any zoning changes are made.
2. We are disappointed that you have reverted back to discouraging public participation by going back to scheduling these public hearings during the normal work hours and in the smaller venue at the Courthouse Annex. From our count, there were comfortably 157 attendees at the 4:30 pm meeting held on March 26<sup>th</sup> at the Family Living Center, vs. a packed house of 73 attendees at the 9:00 am meeting held on February 19<sup>th</sup> at the Courthouse Annex. If you honestly want to promote public input and participation, you will reconsider when and where you have scheduled the upcoming public hearings.
3. Comments regarding the CCGP will be forthcoming.

Thank you.

Deborah and Mike Jenkins

### **NOTICE OF PUBLIC HEARING**

NOTICE IS HEREBY given that the Cascade County Planning Board will hold a public hearing in **Room 105 of the Courthouse Annex, 325 2nd Ave North**, Great Falls, Montana, on May 21, 2019 at **9:00AM** to consider whether revisions to the Cascade County Growth Policy (CCGP) will be necessary.

The CCGP is an official statement of public policy to guide growth and manage change for the betterment of the county and its communities. The current CCGP was adopted in May 2014 and is approaching the five-year review required pursuant to §76-1-601(3)(iii) Montana Code Annotated (MCA). The basis for assessing the need for revisions are provided in §10 of the CCGP.

A copy of the CCGP and §76-1, Part 6 of the MCA are on file in the Planning Division office, Great Falls Public Library, and on the Cascade County Planning Division website under the "Growth Policy" tab. Any interested person may appear and speak for or against revising the CCGP at the public hearing or submit in writing any comments to the County Planning Division Office, 121 4th St N, Great Falls, MT 59401 or by email at [planningcomments@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov). Comments will be accepted on a continual basis, however, to be included in the meeting materials for the planning board, comments must be received by 11:59PM on Monday May 13<sup>th</sup>, 2019. The Planning Division may be contacted at (406) 454-6905.

CASCADE COUNTY PLANNING DIVISION

/s/ Michael Stone

Publication Date: Sunday, April 21, 2019 and Sunday, April 28, 2019



# Public Comment Form

Cascade County Public Works Department Planning Division  
 121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
 Phone: 406-454-6905 | Fax: 406-454-6919  
 Email: [planningcomments@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov)

## Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form. Completed forms may be submitted in person at the Planning Division office or by email at [planningcomments@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov).

## Commenter Information

Name: Carolyn K. Craven

Complete Address: 101 14th Avenue South, Great Falls MT 59405

## Comment Subject (please check one):

- Special Use Permit Application     
  Subdivision     
  Zoning Text and/or Map Amendment  
 Growth Policy     
  Variance     
  Floodplain Regulation Amendment  
 Subdivision Regulation Amendment     
  County Road Abandonment/ Discontinuation of County Street  
 Other (describe): Proposed Zoning Changes Cascade County

## Comment

Please see attached written comments. Thank you!

### Comments Submitted

- 03.08.19 Proposed Zoning Changes
- 03.12.19 Cascade County Growth Plan Goals
- 03.15.19 Zoning Definitions
- 03.21.19 Planning Board Staff Report Growth Plan Goals
- 03.23.19 Questions & Comments
- 03.25.19 Miscellaneous Comments
- 03.26.19 Opinion
- Please note I agree with comments submitted by Tammie Lynne Smith, Conn & Naomi McElvey, Nate Kluz, Dr. Cheryl Reichert, Charles Bocock, Missouri River Citizens, Michael & Deborah Jenkins, Arlyne Reichert
- 4-14-19 Questions for Planning Board and County Civil Attorneys
- 4-15-19 Growth Policy
- 4-25-19 Request Change in May 21 Meeting Purpose
- 4-30-19 Rationale to Update 2014 Growth Policy

### For Office Use Only

Date Received:	<u>4-30-19</u>	Date Reviewed:	<u>5-1-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

April 30, 2019

## PUBLIC COMMENTS ON CASCADE COUNTY GROWTH POLICY

### RATIONALE TO UPDATE 2014 GROWTH POLICY

#### 1) CLIMATE CHANGE

“The growing climate crisis and the emerging policies to address it make it essential for planners to respond to climate change issues now. Policy action on climate change is happening across the nation.”

From American Planning Association Policy Guide on Climate Change

Four ideas form a framework for this guide...

- First, the policy responses to climate change need to be based on the best possible science. Because climate change is bringing about previously unrecorded conditions, projections based on new scientific modeling are the best way to anticipate and respond. Planners must have access to vital data, information and resources to help them interpret these unprecedented changes
- Second, the specific impacts of climate change are highly regional and even local in nature. Therefore, climate change policies cannot be based on a one-size-fits-all approach. Planners must be aware of what the future holds for their particular geographic region and formulate their strategies accordingly. While plans and policies must reflect the individual needs of local areas, any successful mitigation effort will require a national, and indeed international, framework for addressing GHG emission.
- Third, adapting to climate change is just as important as mitigating it. Planners can have a significant effect on climate change mitigation through a variety of actions, including encouraging higher density development, reducing vehicle-miles-traveled (VMT), using green building techniques, and supporting alternative energy sources. However, due to the extent of potential impacts projected under even the most aggressive mitigation scenarios, planners will also need to address the effects of climate change including rising sea levels, greater drought conditions and flood control in planning for adaptation.
- Finally, planners need to communicate about climate change in new and different ways. Policies that we develop now will have a long-range timeframe. Given that it is often hard to keep people engaged over even the short-term, planners will need new communication tools to explain climate change issues and maintain the focus on long-term adaptation and mitigation responses. Citizen participation and engagement is vital to the success of climate change efforts.

**Link to complete APA Policy Guide on Planning and Climate Change**

[https://planning-org-uploaded-media.s3.amazonaws.com/legacy\\_resources/policy/guides/pdf/climatechange.pdf](https://planning-org-uploaded-media.s3.amazonaws.com/legacy_resources/policy/guides/pdf/climatechange.pdf)

**Link to APA Sustainable Policy Framework**

<https://planning-org-uploaded-media.s3.amazonaws.com/document/Sustainability-Policy-Framework.pdf>

C.K. Craven  
Homeowner

## 2) MCA CODE ANNOTATED REQUIREMENT TO REVIEW GROWTH POLICY AND OPPORTUNITY TO REVISE CURRENT GROWTH POLICY

- MCA sections 76-1-601(2)(f)(ii), requires the local government to review the growth policy at least once every 5 years and revise the policy, as necessary. It is during this review that the community should determine if the existing goals and objectives are still appropriate or if they need to be update". (p21) From MT Code Annotated 76-1-601

Legally, there is not a requirement to update the Growth Policy every five years, only to review it and revise as necessary. However, there is an ethical requirement to invite the citizens of Cascade County to participate in a revision of the Growth Policy consistent with the unpredictable environmental changes happening on our planet and unexpected massive proposed zoning changes.

## 3) 2014 GROWTH POLICY

- "At least once every five years after adoption, the Cascade County Planning Board will review the Cascade County Growth Policy to determine if revisions are necessary, as required by 76-1-601 (3)(f) MCA. The basis for such determination whether to revise the Cascade County Growth Policy will include an assessment of the following issues" (p76).  
(Total of nine issues with five discussed below)
  - ☐ Significant changes in existing trends and conditions or projected trends.
    - Having proposed zoning changes eliminating Agriculture zoning is a significant change and has generated numerous public comments. Projected trends include the uncertainties of climate change and the uncertainties of how sustainable the Madison Aquifer is.
  - ☐ Changes in the circumstances upon which the goals and objectives are based.
    - The proposed zoning changes allowing large scale industrialized animal production is a significant change in direction and mandates a thoughtful and thorough dialogue about the kind of future citizens of Cascade County want.
  - ☐ Changes in community goals.
    - The citizens of Cascade County have not had an opportunity to formulate a vision for the net five years, which likely will involve changes. Public input has been provided opposing the significant proposed zoning changes.
  - ☐ Public input suggesting the need to make changes.
    - There has been significant public input regarding maintaining agricultural zoning and opposing the proposed zoning changes, including opposing industrialized animal production, as well as maintaining our open spaces, clean water and air.
  - ☐ Knowledge of specific and identifiable amendments that would improve the Cascade County's Growth Policy's usefulness, so that it better serves the public.
    - Recommended amendments are in process for this public comment period.

**4) OPPORTUNITY TO CREATE A VISION FOR SUSTAINABLE ENVIRONMENTAL HEALTH,  
ECONOMIC GROWTH AND TOURISM**

- Allowing well-planned diverse venues for community dialogue over a period of time appropriate to allow meaningful public input will facilitate a new vision for the next five years. This is our home and we, the public, have a legal and ethical right to participate in the decisions of our elected and appointed government officials in whom we have entrusted the highest well-being of our land, air, water, public health and the social fabric of our communities.

Respectfully submitted,



Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

C.K. Craven  
Homeowner

Date Received: 5-3-19

Date Reviewed: 5-3-19

Complete:  Yes  No

RECEIVED MAY 03 2019

## Growth Policy



Carolyn Craven &lt;lifeisgood4us@xmailpost.com&gt;

Fri 05/03/2019 8:50 AM

To: Ehnes, Anna L. <aweber@cascadecountymt.gov>; Haight, Carey <chaight@cascadecountymt.gov>; Yonker, Charity N. <cyonker@cascadecountymt.gov>; Dan Johnstone <doci@earthlink.net>; Gough, Destiny N. <dgough@cascadecountymt.gov>; Dexter Busby <dbusby@centric.net>; Elliott Merja <emerja@3rivers.net>; Payton, Ian <ipayton@cascadecountymt.gov>; Larson, James <jlarson@cascadecountymt.gov>; Weber, Jane <jweber@cascadecountymt.gov>; Briggs, Joe <jbriggs@cascadecountymt.gov>; Ken Thornton <kkmithornton@msn.com>; Mark Carlson <forwardscout1991@yahoo.com>; Stone, Michael <mstone@cascadecountymt.gov>; Planning Comments <planningcomments@cascadecountymt.gov>; Richard Liebert <wrranch@3rivers.net>; Rob Skawinski <rob@unitedmaterialsgtgf.com>; Hopkins, Sandor R. <shopkins@cascadecountymt.gov>;

Categories: Planning Division Office; PW Directors/Deputy Directors; Planning Division Office

3 attachments (2 MB)

04.30.19 Public Comments.pdf; 04.16.19 Growth Policy Comments.PB Meeting.docx; 04.15.19 Public Comments.pdf;

Dear Chairman Merja, members of the Planning Board and staff,

It has come to my attention that the Planning Division may not see a need to change anything in the 2014 Growth Policy. However, I realize the Planning Board makes the decision on whether or not to revise the Growth Policy and also has the authority to direct the Planning Division as to what, how and when they want the project implemented.

During this comment period through May 13<sup>th</sup>, we are submitting comments on two major issues: 1) Commenting on the need to revise the growth policy, and 2) Commenting on needing more appropriate venues and times for public involvement. We have limited time to address the growth policy in depth.

Attached is my recently submitted April 30<sup>th</sup> public comment, "Rationale to Update 2014 Growth Policy" (please see page 2). I am also submitting my notes for the comments I made at the April 16th Planning Board meeting, as well as what I submitted on April 15<sup>th</sup> on the legal and ethical basis for updating the Growth Policy. I plan to submit more comments on public participation and recommendations for changes in the Growth Policy.

I realize the "letter of the law" only requires a review of the current Growth Policy. However, there is also the ethical component of having requests from the public to discuss what the goals of our community are for the next five years. Public participation in local decision making is fundamental to our democratic process of government. Public participation cannot be ignored or poorly planned. We are experiencing widespread climate uncertainties, many unknowns about the sustainability of the Madison Aquifer, and unexpected zoning changes that may benefit from a thoughtful county-wide dialogue as to what kind of legacy we want to leave to our children and future generations.

It should not be a problem to place a hold on any zoning changes while we take the time needed to revise and change the current Growth Policy with widespread and well-planned participation of the citizens of Cascade County. I have observed that there has not been an obvious rush to actively recruit a new Planning Administrator to fill the position that has been vacant for 2 ½ years. So waiting several weeks or a few months

to revise the Growth Policy before addressing any potential zoning changes should not be a significant problem. I appreciate that the proposed zoning changes have been placed on hold.

Allowing well-planned diverse venues for community dialogue over a period of time appropriate to allow meaningful public input will facilitate a new vision for the next five years. This is our home and we, the public, have a legal and ethical right to participate in the decisions of our elected and appointed government officials in whom we have entrusted the highest well-being of our land, air, water, public health and the social fabric of our communities.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Carolyn K. Craven', with a long horizontal flourish extending to the right.

Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

C.K. Craven  
Homeowner

Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

April 15, 2019

## PUBLIC COMMENTS ON CASCADE COUNTY PROPOSED ZONING CHANGES

### GROWTH POLICY

*Thank you to Chairman Merja and the members of the Planning Board for accommodating requests for the later time and larger venue used for the March public meeting and for reading and responding to the public comments to date.*

There have been numerous public comments recommending that the 2014 Growth Policy be updated via a series of public input sessions prior to even thinking about changing any zoning regulations. Below please find references from *MT Code Annotated*, *MT Local Government Board Handbook 2011*, *MT Planning Board Members Handbook 2009*, *MT Growth Policy Resource Book 2009*, *MT Dept of Commerce Community Needs Assessment 2007*, and *Cascade County Growth Policy 2014* to reinforce the legal and ethical requirements to update the Growth Policy, which is due to be updated in May 2019. Based on the recommendations in these documents, it is likely that a Growth Policy update with numerous opportunities for public input via small groups and public meetings could easily take several months prior to beginning any possible zoning changes. I am respectfully requesting that the Planning Board will vote to “take some other action related to preparation of a growth policy” (SB 326) and vote to “prepare a growth policy to promote public health, safety, morals, convenience, general welfare, efficiency, and the economy” (MCA 76-1-106). I also respectfully request that the Planning Board provide numerous opportunities and venues for public input for a revised Growth Policy over the next several months. The information below provides several pertinent references from these documents as the basis for these requests.

*“Positive change requires a clear mandate, open meetings, succinct explanations, and plenty of opportunity for public input”.* Arlyne Reichert, Public Comments 3-9-19

#### References

- ❖ The 2003, Montana Legislature amended the 1999 growth policy statute through SB 326. The amended statute “Authorizes the planning board to recommend that a growth policy be adopted or not adopted or recommend that the governing body take some other action related to preparation of a growth policy after the public hearing.
- ❖ Upon request of the public body, “the planning board will prepare a growth policy to promote public health, safety, morals, convenience, general welfare, efficiency, and the economy”. (MCA 76-1-106)

C.K. Craven 04.15.19  
Homeowner

**1) MONTANA CODE ANNOTATED (MCA) 76-1-601**

Development of a Growth Policy (76-1-601, MCA): In Montana, a growth policy is an official public document adopted and used by local governments as a general guide for decisions regarding the community's physical development. Growth policies were previously known as, and you may still hear them referred to, as "master plans" or "comprehensive plans." A growth policy itself is not a regulatory document; rather, it is an official statement of public policy to guide growth and manage change for the enhancement of the community.

**2) Excerpts from MONTANA CODE ANNOTATED 76-2-203**

Criteria and guidelines for zoning regulations.

(1) Zoning regulations must be:

- (a) made in accordance with the growth policy; and
- (b) designed to:
  - (i) secure safety from fire and other dangers;
  - (ii) promote public health, public safety, and general welfare; and
  - (iii) facilitate the adequate provision of transportation, water, sewerage, schools, parks, and other public requirements.

(2) In the adoption of zoning regulations, the board of county commissioners shall consider:

- (a) reasonable provision of adequate light and air;
- (b) the effect on motorized and nonmotorized transportation systems;
- (c) compatible urban growth in the vicinity of cities and towns that at a minimum must include the areas around municipalities;
- (d) the character of the district and its peculiar suitability for particular uses; and
- (e) conserving the value of buildings and encouraging the most appropriate use of land throughout the jurisdictional area.

(3) Zoning regulations must, as nearly as possible, be made compatible with the zoning ordinances of nearby municipalities. History: Sec. 4, Ch. 246, L. 1963; R.C.M. 1947, 16-4704; and. Sec. 15, Ch. 582, L. 1999; and Sec 3, Ch. 87, L. 2003; and. Sec. 7, Ch. 446, L. 2009.

**3) Excerpts from MT LOCAL GOVERNMENT BOARD HANDBOOK 2011**

The planning board serves to advise the local governing body. The board may propose policies for: subdivision plats; development of public ways, places, structures, and utilities; issuance of improvement location permits; and laying out public ways and services. Upon request of the public body, the planning board will prepare a growth policy to promote public health, safety, morals, convenience, general welfare, efficiency, and the economy (MCA 76-1-106). The governing authorities shall also require the county planning board to recommend boundaries and appropriate regulations for the various zoning districts (76-2-204).

**4) Excerpts from MT PLANNING BOARD MEMBERS HANDBOOK 2009**

- County Planning Board, 76-1-211, MCA
  - At least one member of a county planning board must be a member of the governing board of a conservation district.
- Definitions 6-1-103. As used in this chapter, the following definitions apply:
  - (4) "Growth policy" means a comprehensive development plan, master plan, or comprehensive plan that was adopted pursuant to this chapter before October 1, 1999, or a policy that was adopted pursuant to this chapter on or after October 1, 1999. (p113)

- Relationship with Governing Body
  - As mentioned before, the planning board serves in an advisory function to the governing body (76-1-106, MCA). This combination of planning board recommendations and governing body decisions influences land use in a community. Because the relationship between the two bodies is so important, the two should meet periodically to discuss issues regarding community planning and land-use policy. If the governing body has certain policies it wishes to pursue, the planning board needs to understand them, and how the governing body would like to achieve them. Conversely, the planning board members should share their concerns and ideas with the governing body. Ultimately, the two entities may not agree on policy or how to implement it, but at least each will be informed so they can make decisions and recommendations accordingly.
  
- Community planning entails a lot of time, work and resources. It includes making difficult decisions and is neither quick nor easy. Ultimately it should be a process that benefits all Montanans by providing:
  - Sustainable rural lifestyles and vibrant cities and towns.
  - Conservation of rural landscapes.
  - Balance between economic growth and quality of life.
  - Education and engagement of the public.
  - A sound basis for land use decisions. (p22)
  
- Conservation of Landscapes
  - Planning can help conserve landscapes which provide important public benefits such as wildlife habitat, storage of floodwaters, groundwater recharge and view sheds that would be difficult and expensive to replace if damaged. (p23)
  
- In order for zoning regulations to be effective and legally sound, they must be developed in a manner that is consistent with the goals and objectives found in a community's growth policy. (p29)
  
- Public participation is not only required under statute, but local governments must encourage participation by developing local procedures for such purposes. Section 2-2-103, MCA, states that "Each agency shall develop procedures for permitting and encouraging the public to participate in agency decisions that are of significant interest to the public. The procedures must ensure adequate notice and assist public participation before a final agency action is taken that is of significant interest to the public." Adequate notification is critical for not only ensuring public participation but also to avoid any litigation that could arise for not following statutory procedures. Section 2-3-104, MCA spells out that "An agency shall be considered to have complied with the notice provisions of 2-3-103 if:
  - an environmental impact statement is prepared and distributed as required by the Montana Environmental Policy Act, Title 75, chapter 1;
  - a proceeding is held as required by the Montana Administrative Procedure Act;
  - a public hearing, after appropriate notice is given, is held pursuant to any other provision of state law or a local ordinance or resolution; or
  - a newspaper of general circulation within the area to be affected by a decision of significant interest to the public has carried a news story or advertisement concerning the decision sufficiently prior to a final decision to permit public comment on the matter." (p33)

### 5) Excerpts from MT GROWTH POLICY RESOURCE BOOK 2009

- The purpose of this publication is to help local officials and Montana citizens understand how they can work to manage change and preserve the quality of life in their communities through the tools provided by Montana's planning statute.

*\* In this publication, the term "community" or "communities" will be used broadly to include all of Montana's general-purpose local governments, towns, cities, and counties.*

- The Montana Environmental Quality Council report, *Planning for Growth in Montana*, identified several benefits of community planning, including the following:
  - 1) *Fosters wise and thoughtful investments in major public facilities, such as roads, water and sewer systems, solid waste, and fire protection.*
  - 2) *Makes communities safer and healthier by encouraging well-designed streets, protecting water quality, and deterring development in unsuitable areas such as floodplains, wetlands, fault zones, and unstable slopes.*
  - 3) *Helps to make a community more attractive to investment by businesses and industries.*
  - 4) *Protects special community values, such as historic, cultural, scenic and natural features, or rural, agricultural character.*
  - 5) *Builds public consensus and greater understanding of issues within the community.*
  - 6) *Promotes affordable housing.*
  - 7) *Identifies growth patterns that minimize the cost to provide local services and infrastructure.*
  - 8) *Maintains property values for residential, commercial, and industrial properties by preventing nearby incompatible or degrading uses.*
  - 9) *Ensures that adequate amounts of suitable land are available for residential, commercial, and industrial growth.*
- Many communities find that their land use policies are written after the fact as a consequence of subdivision review, rather than in advance through a thoughtful process of community planning.
  - A statement in the Great Falls City-County Comprehensive Plan sums up why any community, growing or declining, should plan for its future:
    - **"Planning allows the community to envision its future and proactively work to achieve it, instead of just reacting and moving from one short-range, quick-fix solution to another, as events occur."**
- In the 2003, Montana Legislature amended the 1999 growth policy statute through SB 326. The amended statute:
  - Authorizes the planning board to recommend that a growth policy be adopted or not adopted or recommend that the governing body take some other action related to preparation of a growth policy after the public hearing.  
*(Under the previous statute, the planning board was only authorized to recommend the proposed growth policy, regardless of the comments received at the public Hearing.*  
*(p11)*

- Section 76-1-601, MCA identifies several elements that must be addressed as part one of the growth policy. The statute does not define the extent to which each element must be described. The **required** elements include: *[among ten total required elements]* (p13)
  - Community goals and objectives;
  - Maps and text that describe the existing characteristics and features of the jurisdictional area (including information on land uses, population, housing needs, economic conditions, local services, public facilities, natural resources, and other characteristics);
- In order for zoning to be effective (and legal), the zoning regulations must be consistent with the goals and objectives identified in the growth policy. (p46)
- Under Montana statute, planning boards are the only public entities authorized to prepare growth policies. Creating a growth policy takes considerable time and effort by the planning board and its planning staff or consultant. The more thorough the process is, the more time will be necessary for completing the plan, developing the implementation tools, and carrying out the policy. (p15)
  - It should be noted that MCA sections 76-1-601(2)(f)(ii) and (iii), require the local government to include as part of the growth policy *"a list of conditions that will lead to a revision of the growth policy; and a timetable for reviewing the growth policy at least once every 5 years and revising the policy, if necessary."* It is during this review that a community should determine if the existing goals and objectives are still appropriate or if they need to be updated. (p21)
- One of the most important phases of the development of a growth policy is the articulation of community goals and objectives. The development of goals and objectives provides the philosophical framework for the growth policy. The growth policy goals and objectives are statements describing the way the community wants to develop socially, economically, and physically. They are intended to guide the growth and development of the city, town, county, or other planning area covered by the growth policy. (p18)
- The EQC report, *Planning for Growth in Montana*, encourages a "community visioning process" as a preliminary step in defining goals and objectives. "Community visioning" is defined as "a process through which a community imagines the future it most desires and then plans to achieve it." According to the EQC report, an advantage of this approach is that it results in a positive statement and emphasizes areas of agreement. (p18)
  - The EQC report *"concluded that more emphasis must be placed on planning and implementation measures rather than relying on subdivision review alone to address growth."*
- Since the goals and objectives are the foundation for the growth policy, broad public participation in the formation of those goals and objectives is crucial to assure the success in developing the growth policy and implementing it. Public participation in local decision making is fundamental to our democratic process of government. Public participation cannot be ignored, or poorly planned and carried out. While successful citizen participation is a crucial element in developing a growth policy, it is also possibly the greatest challenge in the process. (p22)

- The growth policy must describe the projected long-term trends for each of the inventory items and other elements proposed by the planning board and adopted by the governing body. (p24)
- A land use study is basic to effective land use planning and to the use of implementation tools as zoning or subdivision regulations. A land use study analyzes the way in which community lands are being used: (residential, commercial, industrial, agriculture, public, transportation). Sometimes information may be easier to analyze in tables or charts. However, maps depicting information are likely to be more easily understood by the general public. Therefore, most land use studies use maps show various information (e.g. topography, vegetation, parcel density, road networks), supported by descriptive, analytical narrative and documentation. One of the best ways to begin a land use study is by creating base maps. These are maps that visually show you the inventory of your community: roads, parcels, public facilities, lakes, streams, rivers, vegetation, wildlife, floodplains etc. (p25)
- Closely related to projected land use is the topic of access and transportation. The physical layout and spatial arrangement of the land uses have to be logically related to a transportation network that provides efficient movement of people and goods. (p29)
- Along with the land use study, the physical and environmental characteristics and constraints of a community must be assessed within the geographic limits of the planning area. Physical and environmental characteristics and constraints are some of the most important factors in determining which areas are most appropriate for development. In this element of the growth policy, information on topography, slope, geology, soils, vegetation, hydrology, wildlife, climate, flood and earthquake hazards, and other topics are presented. The interrelationships between different physical and environmental characteristics and suitability for development, human activities, and land uses should be considered. It is especially important that environmental constraints for different types of land development activities and land use activities be identified. Key natural (i.e. prime agricultural lands, big game winter range, wetlands, floodplains) and historical or archaeological resources that may need additional protection or accommodation should also be identified. (p33)
- MCA 76-1-601(2)(c) requires *“projected trends for the life of the growth policy for each of the following elements: land use; population; housing needs; economic conditions; local services; natural resources; and other elements proposed by the planning board and adopted by the governing bodies”* be included as part of the growth policy. (Note that the only topic described in the data-gathering section above that is not included here is public facilities. That is because the statute specifically requires the development of *“a strategy for development, maintenance, and replacement of public infrastructure, including drinking water systems, wastewater treatment facilities, sewer systems, solid waste facilities, fire protection facilities, roads, and Bridges”*). (p35)
- MCA 76-1-601(2)(d) requires that the growth policy must have *“a description of policies, regulations, and other measures to be implemented in order to achieve the goals and objectives established pursuant to [this planning process].”* (p37)

- Summary: A variety of background information and studies are undertaken to produce a greater understanding of the community, and as preparation for guiding growth. Such broad topics as economics, population, land use, transportation, physical land characteristics, public facilities, public services and housing are examined in varying detail, related to each other. Information sources include published and unpublished documents, private citizens in the local communities, and local, state, and federal public agencies or non-profit organizations. Those characteristics and items capable of being mapped are graphically displayed on base maps of the planning area. Visually depicting such information through maps, charts, or graphs helps the public to discern physical relationships and the public and local officials to draw conclusions and develop action plans. A summary of any related background or special studies should be made available for public review in an easily understandable format. (p36)

#### **6) Excerpts from CASCADE COUNTY GROWTH POLICY 2014**

- The Cascade County Growth Policy serves as a comprehensive plan to provide guidance on decisions regarding land development and public investments.
  - Because growth policies have a significant impact on the ability to develop private land, a thorough public involvement process is critical to formulating these strategies.
  - This growth policy's designated growth areas are the result of time intensive public involvement efforts.
- The first Cascade County Development Plan was created "through the use of community surveys, citizen advisory committees, public hearings, and citizen comments (Cascade County Growth Plan 2014, (p11))
- Subsequent iterations of the Cascade County Growth Plan involved extensive public involvement including "public hearings, conducted in Monarch, Sun River, Centerville, Cascade, Belt and Great Falls" with opportunities for additional public input, ideas and suggestions.
- In the current 2014 Cascade County Growth Plan, the authors stated that "more extensive updates to the Growth Policy may require a re-write with additional public participation in the future".

(p12)

**I strongly urge we follow the above recommendations of our county leaders!**

- In Chapter 3, Public Participation, of this 2014 Growth Policy, the authors wrote that:
  - Since the goals and objectives are the foundation for the growth policy, broad public participation in the formation of those goals and objectives is crucial to assure the success in developing the growth policy and implementing it. Public participation in local decision making is fundamental to our democratic process of government.
  - Public participation cannot be ignored, or poorly planned and carried out. While successful citizen participation is a crucial element in developing a growth policy, it is also possibly the greatest challenge in the process.
  - Good public participation can highlight concerns and issues not always apparent to the local planners or officials. It can provide a voice for diverse interests and helps a community "buy into" the reasons for a growth policy. If the public has been part of the process then they will have "ownership" of the final document. An additional benefit of public participation is that when properly documented, it gives significant legal support to the growth policy when it is officially adopted by local government. Growth policies that reflect the vision of a community through citizen participation and that comply with Montana's statutory requirements will generally withstand most legal challenges.

7) Excerpts from COMMUNITY NEEDS ASSESSMENT PROCESS / MT DEPT OF COMMERCE 2007

*"The future now depends on people all over the country working together to make things better in their particular place. It depends on people in different kinds of places - large and small towns, urban and rural neighborhoods - asking themselves what can we do to make this community a more hopeful place to be young, a more rewarding place to work, and a more friendly place to grow old."*

Alice Rivlin, former Director of the Congressional Budget Office & Vice-Chair of the Federal Reserve Board

- This can be an excellent opportunity to ask "what's good about our community and how can we make it better?" Identify the positive aspects of the community and develop a strategy for building upon them to make the community an even better place to live.

Thank you for the opportunity to submit public comments.

Respectfully submitted,



Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

C.K. Craven 04.15.19  
Homeowner

Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

**PUBLIC COMMENTS**  
**April 16, 2019**

Thank you, Mr. Chairman, for putting the Growth Policy on today's agenda and for accommodating public requests for the later time and larger venue for the March 26<sup>th</sup> Hearing.

*From MT Code Annotated*

- MCA sections 76-1-601(2)(f)(ii) and (iii), require the local government to **review the growth policy at least once every 5 years and revising the policy, as necessary.** It is during this review that **the community should determine** if the existing goals and objectives are still appropriate or if they need to be updated. (p21)

*From MT Growth Policy Resource Book 2009*

- Under Montana statute, planning boards are the only public entities authorized to prepare growth policies. Creating a growth policy takes considerable time and effort by the planning board and its planning staff or consultant. The more thorough the process is, the more time will be necessary for completing the plan, developing the implementation tools, and carrying out the policy. (p15)
- In this same document there was reference to a statement in the Great Falls City-County Comprehensive Plan that sums up why any community, growing or declining, should plan for its future. The authors of that Great Falls City-County Comprehensive Plan stated:
  - **“Planning allows the community to envision its future and proactively work to achieve it, instead of just reacting and moving from one short-range, quick-fix solution to another, as events occur.”** (p8)
    - **I respectfully submit that we should follow the advice of our Great Falls leaders who penned those words.**
- The MT Growth Policy Resource Book also states that:

“Under Montana statute, planning boards are the only public entities authorized to prepare growth policies. Creating a growth policy takes considerable time and effort by the planning board and its planning staff or consultant. The more thorough the process is, the more time will be necessary for completing the plan, developing the implementation tools, and carrying out the policy.
- One of the top ten land use and planning principles is that “community planning should be inclusive”. Another is “to adopt sustainable development practices”. (Martin Landers, AICP)

- The first Cascade County Development Plan was created **“through the use of community surveys, citizen advisory committees, public hearings, and citizen comments** (Cascade County Growth Plan 2014, p11)
  - Subsequent iterations of the Cascade County Growth Plan involved extensive public involvement including “public hearings, conducted in Monarch, Sun River, Centerville, Cascade, Belt and Great Falls” with opportunities for additional public input, ideas and suggestions.
  - Because growth policies have a significant impact on the ability to develop private land, a thorough public involvement process is critical to formulating these strategies.
    - This growth policy’s designated growth areas are the result of time intensive public involvement efforts.
  - **In the current 2014 Cascade County Growth Plan, the authors stated that “more extensive updates to the Growth Policy may require a re-write with additional public participation in the future”**. (p12)

*From MT Growth Policy Resource Book 2009*

- One of the most important phases of the development of a growth policy is the articulation of community goals and objectives. (p18)
  - Referenced in this document is the EQC report, *Planning for Growth in Montana*, which encourages a “community visioning process” as a preliminary step in defining goals and objectives. “Community visioning” is defined as “a process through which a community imagines the future it most desires and then plans to achieve it.” According to the EQC report, an advantage of this approach is that it results in a positive statement and emphasizes areas of agreement. (p18)
    - The EQC report *“concluded that more emphasis must be placed on planning and implementation measures rather than relying on subdivision review alone to address growth.”*
- Since the goals and objectives are the foundation for the growth policy, **broad public participation in the formation of those goals and objectives is crucial to assure the success in developing the growth policy and implementing it. Public participation in local decision making is fundamental to our democratic process of government. Public participation cannot be ignored, or poorly planned and carried out.** (p22)

Excerpts From COMMUNITY NEEDS ASSESSMENT PROCESS / MT DEPT OF COMMERCE 2007

*"The future now depends on people all over the country working together to make things better in their particular place. It depends on people in different kinds of places - large and small towns, urban and rural neighborhoods - asking what can we do to make this community a more hopeful place to be young, a more rewarding place to work, and a more friendly place to grow old."*

Alice Rivlin, former Director of the Congressional Budget Office & Vice-Chair of the Federal Reserve Board

- This can be an excellent opportunity to ask "what's good about our community and how can we make it better?" We can identify the positive aspects of the community and develop a strategy for building upon them to make our county an even better place to live.

We each have an opportunity to engage in the process of creating a greater vision to ensure a legacy to our children and future generations – a legacy of maintaining the beauty of our county's open spaces, healthy soil, clean water and air and an overall healthy environment. I echo the words of Arlyne Reichert, who stated in her public comments of March 9<sup>th</sup>, that **"positive change requires a clear mandate, open meetings, succinct explanations, and plenty of opportunities for public input."**





# Public Comment Form

Cascade County Public Works Department Planning Division  
121 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

## Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form.

## Commenter Information

Name: Helen Coleman  
Complete Address: 11 Homestake Lane - Gt. Falls, MT 59405

## Comment Subject (please check one)

- Special Use Permit Application
- Subdivision
- Zoning Text and/or Map Amendment
- Growth Policy
- Variance
- Floodplain Regulation Amendment
- Subdivision Regulation Amendment
- County Road Abandonment/ Discontinuation of County Street
- Other (describe): \_\_\_\_\_

## Comment

See Additional Page!

### For Office Use Only

Date Received:	<u>5-7-19</u>	Date Reviewed:	<u>5-7-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Thank you for seeking input from land owners and neighbors .

I apposed several items in the proposed zoning changes so I found reading the growth police was most interesting. The public was not involved in any of these proposed changes.

The entire purpose of the growth policy needs to involve public involvement because of the significant impact on the ability to develop private land.

One of the objectives of the 2014 growth policy appears to enhance the rural area and agricultural area already enjoyed by the Cascade County s citizens without making divisions into these areas of M 20 and MU 40 areas allowing industrial and commercial uses. The concern here is obvious: enjoying the rural areas and agricultural areas will be adversely effected by zoning changes..... so this will be a definite adverse effect.

Goal #2 objectives of fostering the continuance of agriculture and forestry and the intrinsic natural beauty of grazing area, farmlands and forests.... defines the agricultural land use in cascade County without the addition of introducing the Value Added Agricultural Commodity Processing Facilities into these rural areas. This Growth objective by definition is opposite to this Value Added Agriculture Commodity Processing Facility. Starting with the Cheese Processing plant which is only step one of the slaughterhouse.

Goal #8 Protect surface and groundwater quality from pollution.

Last November I took the liberty of writing to John LaFave ...Program manager, Ground Water Assessment Program, inquiring about the process of the slaughterhouse effects or using so much water from the Madison Aquifer... At that time he had just learned of the project and didn't have too much information about what effects these changes would cause. So i wrote again this month about additional information available. At this time I have not heard from him nor if more information is available about the possible effects from usage of huge amounts of water from the Madison Aquifer but do have my own doubts that anything positive will show up nor that the negative possibilities can be identified before the projected tremendous usage. .

Lets face it the Cheese Processing Plant is one foot into the slaughterhouse and the water quality from pollution from this slaughterhouse will impact the growth policy of protecting these surface and groundwater quality from pollution..... The growth policy impacts the desires and plans of the community of Great Falls and what exactly this community wants.

Groups of people will be effected by the proposed zone changes . Especially the landowners and their neighbors especially the well users of the Madison Aquifer.

Thank you for seeking input from Great Falls citizens.

*Nolan Coleman* 0030 Pg 2



**D. Starshine  
1200 32nd St. S. #23  
Great Falls, MT 59405  
406-788-2299  
starshine1200@gmail.com**

**Thank you for considering a wider vision for economic growth. Public participation in all government operations is fundamental to our democracy so it is vitally important for you to offer these opportunities for us to voice our visions and concerns.**

**I want Cascade County to have a healthy economic growth which sustains tourists enjoying clean air and water. For example, florists, animal training centers and schools. My main concern is to protect our healthy atmosphere using specific environmental goals.**



# Public Comment Form

Cascade County Public Works Department Planning Division  
121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
Phone: 406-454-6905 | Fax: 406-454-6919  
Email: [planningcomments@casadecountymt.gov](mailto:planningcomments@casadecountymt.gov)

Completed 05/14/2019  
**RECEIVED**  
05/07/2019

## Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form. Completed forms may be submitted in person at the Planning Division office or by email at [planningcomments@casadecountymt.gov](mailto:planningcomments@casadecountymt.gov).

## Commenter Information

Name: Carolyn K. Craven

Complete Address: 101 14th Avenue South, Great Falls MT 59405

## Comment Subject (please check one):

- Special Use Permit Application
- Subdivision
- Zoning Text and/or Map Amendment
- Growth Policy
- Variance
- Floodplain Regulation Amendment
- Subdivision Regulation Amendment
- County Road Abandonment/ Discontinuation of County Street
- Other (describe): Proposed Zoning Changes Cascade County

## Comment

Please see attached written comments. Thank you!

### Comments Submitted

03.08.19 Proposed Zoning Changes

03.12.19 Cascade County Growth Plan Goals

03.15.19 Zoning Definitions

03.21.19 Planning Board Staff Report Growth Plan Goals

03.23.19 Questions & Comments

03.25.19 Miscellaneous Comments

03.26.19 Opinion

Please note I agree with comments submitted by Tammie Lynne Smith, Conn & Naomi McElvey, Nate Kluz, Dr. Cheryl Reichert, Charles Bocock, Missouri River Citizens, Michael & Deborah Jenkins, Arlyne Reichert

04-14-19 Questions for Planning Board and County Civil Attorneys

04-15-19 Growth Policy

04-25-19 Request Change in May 21 Meeting Purpose

04-30-19 Rationale to Update 2014 Growth Policy

05.07.19 Rationale for Public Participation in 2014 Growth Policy Revisions

### For Office Use Only

Date Received:	<u>5-7-19</u>	Date Reviewed:	<u>5-7-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

May 7, 2019

## **PUBLIC COMMENTS ON CASCADE COUNTY GROWTH POLICY**

### **RATIONALE FOR PUBLIC PARTICIPATION IN 2014 GROWTH POLICY REVISIONS**

**I respectfully submit that the 2014 Growth Policy is due for revisions with public input.**

The 2014 version only added “recommendations regarding updating the Growth Policy to incorporate language related to potential conflicts between development and the military mission. Those changes were incorporated along with several minor updates in 2013. Following the public comment period, Cascade County adopted the changes recommended.” The authors also stated that “*More extensive updates to the Growth Policy may require a possible re-write with additional public participation in the future.*”

There have not been any major revisions since the 2006 Growth Policy. However, we are collectively experiencing significant changes both locally and globally. We are faced with the uncertainties of climate change, including challenges globally with droughts and floods. We are unsure of the long-term sustainability of the Madison Aquifer. Our education system is currently below average and our students have fewer opportunities to learn technology and the required skills to gain employment in that growing sector. We have positive changes in healthcare, with medical marijuana providers being recognized in the medical community. Public comments have reinforced changes in community goals and concerns about the direction we are currently headed in the county.

The 2014 Growth Policy states the basis for determining whether to revise the Growth Policy will include an assessment of “Significant changes in existing or projected trends, Changes in the circumstances upon which the goals and objectives are based, Changes in community goals, Knowledge of specific and identifiable amendments that would improve the Growth Policy’s usefulness, and Public input suggesting the need to make changes (5/9 items).

**Please see items below on Montana cities and counties updating and revising their Growth Policies. Included are the City of Great Falls 2013, Billings 2016, Helena 2019, Missoula County 2016, Lake County 2017 and Phillips County 2018. They have included well-planned public comments via conversations in various venues over an extended period of time, including hiring a consultant, public meetings, online questionnaires, Facebook, working groups for key players (i.e. fire, police, transportation, housing), opportunities for citizens to sign up for working groups, community presentations, presentations to social and professional groups, SWOT analysis (strengths, weaknesses, opportunities, threats), an up-to-date County Growth Policy website for continual information and results from the working groups, plus press releases to the media.**

C.K. Craven  
Homeowner

### CASCADE COUNTY GROWTH POLICY 2014

The Cascade County Development Plan was approved in 1979 with subsequent revisions. The new Growth Policy was adopted in 2006 with a subsequent update with minor revisions adopted in 2014. In the 2014 Growth Policy the authors stated that the next revision with “more extensive updates to the Growth Policy **may require a rewrite with additional public participation**” (p12).

“The Cascade County Growth Policy serves as a comprehensive plan to provide guidance on decisions regarding land development and public investments.....Because growth policies have a significant impact on the ability to develop private land, a **thorough public involvement process is critical** to formulating these strategies. This growth policy’s designated growth areas are the result of **time intensive public involvement efforts. The Cascade County Growth Policy is a living document that is reviewed and updated periodically in order to address changes within the community that may alter the considerations for land development and public investment.** (p10)

### CITY OF GREAT FALLS 2013 REVISION OF GROWTH POLICY - CITY-WIDE SURVEY

“To launch the public participation phase for Imagine Great Falls, the City offered a 25-question **survey to ascertain public opinion on a number of potential plan objectives.** The survey was made available at the initial **Open House, as part of over 40 presentations and also on-line on the City’s website.** **Responses from 625 people** were received. These responses, combined with the input derived from presentation exercises, the **Open House** and the **working group reports,** helped to form for the development of the Imagine Great Falls project.”

### CITY OF BILLINGS GROWTH POLICY UPDATE 2016

“Since the last update to the City and County Growth Policy in 2008, the City of Billings has added more than 6,000 people and has expanded by 1.5 square miles.....Growth alone has public costs associated with it but the needs and **preferences of the public may also increase costs as values and priorities change. One of the main purposes of this Growth Policy is to determine current public values and priorities.** A second purpose is to compare patterns of growth to examine if there are more cost-effective ways to develop. The approach to this Growth Policy and the methods used were tailored to address the two main purposes. **Through an extensive public comment process and carefully modeled growth scenario planning,** a vision for Billings in the next 20 years emerged. This vision is embodied in the Growth Policy Statement...Most importantly, **the citizens of Billings who provided comments and attended the public meetings need to be recognized.** Thanks to everyone for the support and direction given during this process...The **public comments were also the basis** for three other important elements of this Policy: objectives, toolboxes, and performance measurements.”

### CITY OF HELENA GROWTH POLICY UPDATE 2019

“The City of Helena, in its efforts **to provide a more inclusive, dynamic and vibrant community,** has chosen to undertake certain long-range planning activities including a Growth Policy update. This guiding document provides a road map for the management of growth within and adjacent to the city limits. The City hopes that this along with other adopted documents can provide residents, staff, and investors with the tools they need to better understand the city and how to best navigate the development process. A Growth Policy in Montana must address certain criteria as set forth in the Montana Code Annotated. Among the criteria are topics such as housing needs, economic conditions, local services and public facilities. **We have hired a consultant,** SCJ Alliance, to assist with the development of the city’s Growth Policy. **We would like for you to be involved in the process by submitting a comment, attending public meetings, or scheduling a meeting with staff to discuss your ideas.”**

C.K. Craven  
Homeowner

### **MISSOULA COUNTY GROWTH POLICY 2016**

*Missoula adopted a Growth Policy in 2006 and made minor revisions in 2014. At that time a process was initiated to review and update, continuing until 2016. The process included **three full rounds of public outreach and engagement, plus review of goals, objectives and other elements of the Growth Policy with corresponding public hearings.** The review determined revisions were warranted **“based on changes in community goals that would improve the Growth Policy’s usefulness so that it better serves the public”**.*

### **PHILLIPS COUNTY GROWTH POLICY 2017**

*This is an update and revision of the 2006 Growth Policy.*

***“Public involvement will continue to mandate attention to processes and revisions of land use and similar plans for the administration of public lands, wildlife and their impacts within Phillips County.”** GOAL: Maintain land use and development in Phillips County that balances the many needs and interests **which will not remove agriculture and grazing lands from production** while maintaining our rural quality of life for the County’s current and future generations.*

### **LAKE COUNTY GROWTH POLICY UPDATE 2018**

*The initial Growth Policy was adopted in 2003 with updates in 2005. This 2018 revised Growth Policy reflects significant public input, as per this acknowledgement:*

***“Thank you to all participants! A special thanks to all of the dedicated residents of Lake County who contributed to this growth policy in their free time by participating in public meetings, submitting comments, filling out surveys and questionnaires, answering our questions, and giving information and photos. Your time, efforts and ideas are very much appreciated and reflected in this plan. We would also like to thank local newspapers and radio stations who published articles and interviews on the growth policy rewrite and kept the public informed.”***

**A Growth Policy is:**

A community **vision** for how it sees its **future**

A community **vision** for **how** and **where** it wants to **grow**

**An official statement of public policy** to guide growth and change

A **dynamic document** that **changes** with the community

It has been shown that local officials are well aware that formal public hearings are sometimes a very ineffective means of getting people involved or encouraging meaningful dialogue or discussion.

## RECOMMENDATIONS FOR PUBLIC PARTICIPATION

### 1) Focus Groups

#### ➤ Possible Categories

- Environment
  - Land – Air – Energy
- Water
- Missouri River Corridor
- Economic
- Technology & Education
- Community Health
- Housing
- Transportation
- Cultural
- Tourism
- Land Use
- Public Services & Facilities
- City-County Interface
- Public Input

- 2) Outreach via social media/Facebook, television, regular updates in printed and online newspapers (including The Electric and Montana Today)
- 3) Create and provide easy access to Cascade County Growth Policy Revisions 2019 website for residents to read and add suggestions and comments
- 4) Provide email/text notifications of meetings, presentations and updates
- 5) Online poll on preserving Agricultural zoning/add/delete definitions, etc.
- 6) Online poll for expanded clarity of categorizing Agricultural-Crop Production and Agricultural-Animal Production, as the impacts of each are vastly different
- 7) Town hall meetings in the incorporated communities in Cascade County
  - Great Falls, Cascade, Belt, Niehart

### LEGAL CITATIONS

- 2017 MCA 76-1-601(2) requires the local government to review the growth policy at least once every 5 years and revise the policy, as necessary.
- 2017 MCA 76-1-601(3) A growth policy must include: a) **community goals and objectives**.
- 2017 MCA 76-1-601 (3) A growth policy must include: (g) a statement of how the governing bodies will coordinate and cooperate with other jurisdictions that explains: (ii) if a governing body is a county, how the governing body will coordinate and cooperate with cities and towns located within the county's boundaries on matters related to the growth policy.
- Public participation is not only required under statute, but **local governments must encourage participation by developing local procedures for such purposes**.  
2017 MCA 2-3-103, states that "Each agency shall develop procedures for permitting and encouraging the public to participate in agency decisions that are of significant interest to the public. The procedures must ensure adequate notice and assist public participation before a final agency action is taken that is of significant interest to the public."  
*From MT Planning Board Members Handbook 2009*
- One of the most important phases of the development of a growth policy is the articulation of **community goals and objectives**. The development of goals and objectives provides the philosophical framework for the growth policy.  
*From MT Growth Policy Resource Book 2009 (p18)*

Article 2 Section 3 of the MT Constitution guarantees Inalienable Rights. "All persons are born free and have certain inalienable rights. **They include the right to a clean and healthful environment** and the rights of pursuing life's basic necessities, enjoying and defending their lives and liberties, acquiring, possessing and protecting property, and seeking their safety, health and happiness in all lawful ways. In enjoying these rights, all persons recognize corresponding responsibilities.

**Because zoning must correlate to the Growth Policy, it is important to address additional goals in revising the Growth Policy, including an emphasis on environmental quality, and to ensure that the collective community is creating a vision we can agree on for the future of our county. The vision created through the Growth Policy is the basis for the types of zoning regulations we need to create.**

**There should be no reason to be in a hurry, but rather to invest wisely in taking the time to make thoughtful decisions.**

## ADDITIONAL INFORMATION

One of the most important phases of a growth policy is the articulation of community goals and objectives for our county. A “community visioning process” is one of the processes through which our county imagines the future it most desires and then plans to achieve those goals. Broad public participation is crucial to assure the success in this revision process. Public participation in local decisions is fundamental to our democratic process of development.  
*MT Growth Policy Resource Book 2009*

Growth policies that reflect the vision of a community through citizen participation and that comply with Montana’s statutory requirements will generally withstand most legal challenges. The Montana Environmental Quality Council report, *Planning for Growth in Montana*, identified several benefits of community planning, including the following:

- *Makes communities safer and healthier by encouraging well-designed streets, protecting water quality, and deterring development in unsuitable areas such as floodplains, wetlands, fault zones, and unstable slopes.*
- *Protects special community values, such as historic, cultural, scenic and natural features, or rural agricultural character.*
- *Builds public consensus and greater understanding of issues within the community.*
- *Maintains property values for residential, commercial, and industrial properties by preventing nearby incompatible or degrading uses.*

Good public participation can highlight concerns and issues not always apparent to the local planners or officials. It can provide a voice for diverse interests and helps a community “buy into” the reasons for a growth policy or revision. If the public has been part of the process then they will have “ownership” of the final document. An additional benefit of public participation is that when properly documented, it gives significant legal support to the growth policy when it is officially adopted by local government.

There are many methods that can be used to encourage public participation. Informal neighborhood and town meetings, citizen surveys and questionnaires, media coverage, open houses, distribution of printed materials, presentations to civic groups, and public hearings are just a few options. The Montana Department of Commerce, Community Development Block Grant (CDBG) Program, has published a booklet entitled *The Community Needs Assessment Process*, which describes several different methods for encouraging public involvement and obtaining public input. This publication also includes examples of some of the creative ways in which Montana communities have involved the public in the process of identifying community needs and goals and objectives. *(From website: <http://comdev.mt.gov/>)*

**I RESPECTFULLY REQUEST THAT THE PLANNING BOARD RECOMMEND A  
WELL-PLANNED REVISION OF THE GROWTH POLICY WITH ADEQUATE TIME  
TO HAVE PUBLIC MEETINGS AT LATER TIMES TO ENGAGE MORE OF  
THE PUBLIC AND TO RECOMMEND THOUGHTFUL CHANGES.**

Respectfully submitted,



Carolyn K. Craven  
C.K. Craven  
Homeowner



# Public Comment Form

Cascade County Public Works Department Planning Division  
121 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

## Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form.

## Commenter Information

Name: TAMMIE LYNNE SMITH

Complete Address: 397 HIGHWOOD RD., GREAT FALLS, MT 59405

## Comment Subject (please check one)

- Special Use Permit Application       Subdivision       Zoning Text and/or Map Amendment
- Growth Policy       Variance       Floodplain Regulation Amendment
- Subdivision Regulation Amendment       County Road Abandonment/ Discontinuation of County Street
- Other (describe): \_\_\_\_\_

## Comment

TO PLANNING STAFF, PLANNING BOARD, COUNTY ATTORNEY

I request the Planning Board extend their decision regarding the "need for revisions" to the Cascade County Growth Policy, as required by MCA 76-1-601 and defined in Sec 10 of the Growth Policy, to an additional hearing.

MCA 2-3-103 requires all boards, commissios, departments, agencies, and others to facilitate public participation in matters of significant interest to the public. The May 21, 2019 Planning Board Hearing is schedule for 9:00 am.

Continuing to schedule hearings during the normal work day, after the public has made clear their interest in matters as significant as the Growth Policy and the Zoning Regulations clearly discriminates and discourages public participation.

I look forward to hearing the Planning Staff's review and report.

An additional hearing should be scheduled in a larger venue, and later in the day to allow the public access to the Planning Board's discussions and review and an opportunity to participate and express their concerns about the future Growth and development of Cascade County.

### For Office Use Only

Date Received:	<u>4-28-19</u>	Date Reviewed:	<u>4-29-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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# Public Comment Form

Cascade County Public Works Department Planning Division  
 121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
 Phone: 406-454-6905 | Fax: 406-454-6919  
 Email: [planningcomments@casadecountymt.gov](mailto:planningcomments@casadecountymt.gov)

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## Commenter Information

Name: Carolyn K. Craven  
 Complete Address: 101 14th Avenue South, Great Falls MT 59405

## Comment Subject (please check one):

- Special Use Permit Application       Subdivision       Zoning Text and/or Map Amendment  
 Growth Policy       Variance       Floodplain Regulation Amendment  
 Subdivision Regulation Amendment       County Road Abandonment/ Discontinuation of County Street  
 Other (describe): Proposed Zoning Changes Cascade County

## Comment

Please see attached written comments. Thank you!

Comments Submitted  
03.08.19  
03.12.19  
03.15.19  
03.21.19  
03.23.19  
03.25.19  
03.26.19

Please note I agree with comments submitted by Tammie Lynne Smith, Conn & Naomi McElvey, Nate Kluz, Dr. Cheryl Reichert, Charles Boccock, Missouri River Citizens, Michael & Deborah Jenkins, Arlyne Reichert

4-14-19  
4-15-19  
4-25-19

For Office Use Only			
Date Received:	<u>4-25-19</u>	Date Reviewed:	<u>4-25-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

April 22, 2019

## PUBLIC COMMENTS ON CASCADE COUNTY GROWTH POLICY

### REQUEST CHANGE IN MAY 21 MEETING PURPOSE

*From 2014 Cascade County Growth Policy (p10)*

The Cascade County Growth Policy serves as a comprehensive plan to provide guidance on decisions regarding land development and public investments.....**Because growth policies have a significant impact on the ability to develop private land, a thorough public involvement process is critical to formulating these strategies.** This growth policy's designated growth areas are the result of time intensive public involvement efforts. The **Cascade County Growth Policy is a living document** that is reviewed and updated periodically in order to address changes within the community that may alter the considerations for land development and public investment.

Please note the paragraph above was written about the revision process for the 2014 CCGP.

*From MCA 2017 Public Participation*

7-1-4142. Public participation. Each municipal governing body, committee, board, authority, or entity, in accordance with Article II, section 8, of the Montana constitution and Title 2, chapter 3, shall develop procedures for permitting and encouraging the public to participate in decisions that are of significant interest to the public.

- The first item in an email I submitted to the Planning Board on 04.20.19 was:  
*"Would it be possible to schedule an evening meeting at the Family Living Center for the May 21<sup>st</sup> meeting to maximize opportunities for public participation?"*
- Below is the meeting notice published in the GTF Tribune on 04.21.19.  
*"NOTICE IS HEREBY given that the Cascade County Planning Board will hold a public hearing in Room 105 of the Courthouse Annex, 325 2nd Ave North, Great Falls, Montana, on May 21,2019 at 9:00AM to consider whether revisions to the Cascade County Growth Policy (CCGP) will be necessary."*

#### REQUEST

In the unlikely prospect of having the county change the location and time of the May 21<sup>st</sup> meeting, I now respectfully request that the May 21<sup>st</sup> meeting be for public comments to date, plus planning for increased public participation via various outreach formats, including community meetings around the county to determine consensus from the residents of the county on how to revise the 2014 CCGP.

Respectfully submitted,



Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

C.K. Craven  
Homeowner



# Public Comment Form

Cascade County Public Works Department Planning Division  
 121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
 Phone: 406-454-6905 | Fax: 406-454-6919  
 Email: [planningcomments@casadecountymt.gov](mailto:planningcomments@casadecountymt.gov)

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## Commenter Information

Name: Cheryl Reichert, MD, PhD

Complete Address: 51 Prospect Drive, Great Falls, MT 59405

## Comment Subject (please check one):

- Special Use Permit Application     
  Subdivision     
  Zoning Text and/or Map Amendment  
 Growth Policy     
  Variance     
  Floodplain Regulation Amendment  
 Subdivision Regulation Amendment     
  County Road Abandonment/ Discontinuation of County Street  
 Other (describe): \_\_\_\_\_

## Comment

When I first returned to my home town of Great Falls as a young medical professional in the late 1980s, I remember a series of visionary meetings that took place all across town under the leadership of professional moderators. During these public gatherings the idea for River's Edge Trail was born. It convinced me of the importance of having a meaningful public dialogue in planning for the future.

I am concerned that having one hastily planned meeting held during regular working hours forecloses on the option of having a real community conversation about revising the Cascade County Growth Policy. Important decisions are in the offing that will affect the livability of our county for generations to come. These decisions need to be in congruence with an updated Growth Policy. Growth policies require periodic mandatory review to ensure that they evolve with the community. Please don't truncate this important process. Through public dialogue consensus is built, compromise becomes possible, and a better sense of community develops.

Therefore, it is my hope that the 9 am meeting on May 21 will be the start and not the end point of that opportunity.

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\_\_\_\_\_

For Office Use Only			
Date Received:	<u>4-21-19</u>	Date Reviewed:	<u>4-22-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	



# Public Comment Form

Cascade County Public Works Department Planning Division  
 121 4<sup>th</sup> St N, Suite 2H-2I  
 Great Falls, MT 59401  
 Phone: 406-454-6905 Fax: 406-454-6919

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## Commenter Information

Name: J. Casselli

Complete Address: 11 Red Coulee Belt, MT 59412

## Comment Subject (please check one)

- Special Use Permit Application       Subdivision       Zoning Text and/or Map Amendment
- Growth Policy       Variance       Floodplain Regulation Amendment
- Subdivision Regulation Amendment       County Road Abandonment/ Discontinuation of County Street
- Other (describe): public notification

## Comment

RE: Growth Policy Planning Board Discussion of 04-16-2019

Support of the planning board moving to begin the required 5 yr review of the Cascade Co. Growth Policy as outlined under MCA.  
 - Planning staff work should do initial review ahead of public comments to identify known updates needs (i.e. new State laws/legal legal framework/ policy or economics any changes to fire districts, WUI, floodplains, planned MDOT projects, community goals or major countywide items). This will help focus and be a starting point for the review that may or may not be complex.  
 -Current policy from sec 10 has identified public comment be done during a review and is warranted by current requests as recent zoning proposals have highlighted. Need to follow this.

RE: Public Notification Recommendations :

- The required legal notices only reach a few and in a time of reduced paper readership this is becoming less effective
- Public notification needs to be countywide and effective (Staff suggested some rural towm focus group/open house mtgs.- agree!)
- Consider simple meeting flyers posted at rural Post Offices, community centers, and local stores ,Ulm MVC, Niehart store, Belt Groc.
- Web postings do work and are very valuable to get additional information, maps and reports out to the public.
- Consider asking for and creating an email list from sign-in sheets for those willing to provide... and a simple email cc can reach a larger group of known interested folks with minimal effort for specific meetings/notify for new issue comment opportunities.
- Email applicable major notices out to conservation districts, weed districts, vol. fire departments and other community groups
- Consider twitter to tweet out meeting or comment opportunities and include local media outlets (or other social media).

As a board member noted timing and notification requirements can be burdensome but this may be a time for review/revision of these. The county can create some templates for all of the above that need not be complex and may save staff work and funds over time.

### For Office Use Only

Date Received: <u>4-18-19</u>	Date Reviewed: <u>4-19-19</u>	Complete: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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**From:** Jude Smith <judesmith826@gmail.com>  
**Sent:** Tuesday, April 16, 2019 5:10 PM  
**To:** Planning Comments <planningcomments@casadecountymt.gov>  
**Subject:** Growth Policy Changes

Please see the attached for my comments on the Growth Policy.

Thank You,

Jude Smith





# Public Comment Form

Cascade County Public Works Department Planning Division  
121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
Phone: 406-454-6905 | Fax: 406-454-6919  
Email: [planningcomments@casadecountymt.gov](mailto:planningcomments@casadecountymt.gov)

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## Commenter Information

Name: Carolyn K. Craven

Complete Address: 101 14th Avenue South, Great Falls MT 59405

## Comment Subject (please check one):

- Special Use Permit Application       Subdivision       Zoning Text and/or Map Amendment
- Growth Policy       Variance       Floodplain Regulation Amendment
- Subdivision Regulation Amendment       County Road Abandonment/ Discontinuation of County Street
- Other (describe): Proposed Zoning Changes Cascade County

## Comment

Please see attached written comments. Thank you!

- Comments Submitted
- 03.08.19 Proposed Zoning Changes
- 03.12.19 Cascade County Growth Plan Goals
- 03.15.19 Zoning Definitions
- 03.21.19 Planning Board Staff Report Growth Plan Goals
- 03.23.19 Questions & Comments
- 03.25.19 Miscellaneous Comments
- 03.26.19 Opinion
- Please note I agree with comments submitted by Tammie Lynne Smith, Conn & Naomi McElvey, Nate Kluz, Dr. Cheryl Reichert, Charles Boccock, Missouri River Citizens, Michael & Deborah Jenkins, Arlyne Reichert
- 04-14-19 Questions for Planning Board and County Civil Attorneys
- 04-15-19 Growth Policy
- 04-25-19 Request Change in May 21 Meeting Purpose
- 04-30-19 Rationale to Update 2014 Growth Policy
- 05.07.19 Rationale for Public Participation in 2014 Growth Policy Revisions
- 05.11.19 Meeting Times

For Office Use Only			
Date Received:	<u>5-11-19</u>	Date Reviewed:	<u>5-13-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

May 11, 2019

## PUBLIC COMMENTS ON CASCADE COUNTY GROWTH POLICY

### MEETING TIMES

It is difficult to maximize public participation with a 9:00 am meeting time. Numerous public comments have been written or stated since February 2019 requesting a later time and, for major issues, a larger venue.

The Planning Boards in other Montana counties, including Lewis & Clark, Teton, Flathead, Yellowstone, Gallatin, Anaconda-Deer Lodge, Silver Bow, Richland and Lake County ALL have evening meeting times. The Great Falls City Commission has Work Sessions at 5:30 pm and City Commission Meetings at 7:00 pm, which accommodates most of the working public.

- **In public comments I submitted on April 15th, I included this item from the *MT Growth Policy Resource Book*:**
  - “Since the goals and objectives are the foundation for the growth policy, broad public participation in the formation of those goals and objectives is crucial to assure the success in developing the growth policy and implementing it. Public participation in local decision making is fundamental to our democratic process of government. Public participation cannot be ignored, or poorly planned and carried out.” (p22)
- **In that same public comment submission I also included this item from *MCA-76-1-601*:**
  - “Section 76-1-601, identifies several elements that must be addressed as part one of the growth policy. The statute does not define the extent to which each element must be described. The **required** elements, (*among ten total required elements*), include: Community goals and objectives.” (p13)
- **Additionally, per *MCA 2-3-103 Public Participation*:**
  - “(1) (a) Each agency shall develop procedures for permitting and encouraging the public to participate in agency decisions that are of significant interest to the public. The procedures must ensure adequate notice and assist public participation before a final agency action is taken that is of significant interest to the public...”

C.K. Craven  
Homeowner

- **From the *MT Local Government Board Handbook*:**
  - “MCA 2-3-103) The procedures include a schedule of regular meeting times and agenda prepared and posted sufficiently in advance to provide notice of the topics to be discussed and actions to be considered. The public must also be afforded a reasonable opportunity to offer information and opinions, either orally or written, before final decisions are made. A matter of significant public interest is defined as one “involving any non-ministerial decision or action...which has meaning to, or affects a portion of the community.” Discrepancies as to whether a meeting is of a significant public interest should always err on the side of transparency and opportunities for public participation...The amount of notice given should increase with the relative significance of the decision to be made. It is critical to follow the established procedures and to make the procedures known to the public. There is no violation in the law by giving more notice or opportunity to be heard than is required.” (p13)



**I respectfully recommend again that future Planning Board meetings on Growth Policy Revisions and Zoning Issues be scheduled at later times and larger venues when needed to allow more public participation.**

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Carolyn Craven". The signature is fluid and cursive, with a long horizontal line extending from the end.

Carolyn Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

C.K. Craven  
Homeowner



# Public Comment Form

Cascade County Public Works Department Planning Division  
121 4<sup>th</sup> St N, Suite 2H-2I  
Great Falls, MT 59401  
Phone: 406-454-6905 Fax: 406-454-6919

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## Commenter Information

Name: Sue Ann Stephenson-Love  
Complete Address: 300 Southridge Court Great Falls MT 59405

## Comment Subject (please check one)

- Special Use Permit Application       Subdivision       Zoning Text and/or Map Amendment
- Growth Policy       Variance       Floodplain Regulation Amendment
- Subdivision Regulation Amendment       County Road Abandonment/ Discontinuation of County Street
- Other (describe): Need for Review of Growth Policy

## Comment

- May 21 hearing  
See Attached please

### For Office Use Only

Date Received:	<u>5-13-19</u>	Date Reviewed:	<u>5-13-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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May 13, 2019

My comment is consistent with Montana law that provides any and all zoning regulations must be based on and consistent with the County's Growth Policy. Therefore, before any such regulations are adopted, they must first be shown to be consistent with our existing Growth Policy.

Our Growth Policy, which was implemented in 2014 is not currently valid under Montana law, given the statutory requirement that such Growth policies must be reviewed and revised as needed every five (5) years. There has been no such review nor revision, so it is a given that such review and revision now be undertaken.

I urge the Board to undertake this process in a serious, meaningful, transparent process that provides for widespread and well planned participation by the citizens of Cascade County.

Thank you.

Sue Ann Stephenson-Love  
300 Southridge Ct  
Great Falls, MT  
761-6217

Cascade County Commissioners  
RECEIVED

MAY 13 2019

x Planning

173 Dune Dr.

Great Falls, MT 59404

May 13, 2019

Cascade County Commissioners

Courthouse Annex

Great Falls, MT 59401

Dear Commissioners:

I believe that any revision of the county growth policy should address concerns for the county's citizens, especially the following:

fire safety and sheriff and ambulance aid--any large proposed manufacturing project, agriculture -related processing project and/or large clustered housing development should include access for fire containment, suppression and clean-up also services and policing by the sheriff's department with cost being paid by the landowner.

water taken from the land, then used for these projects should be returned to the land only after regular testing to maintain a minimum amount of contamination with county inspection allowed at irregular intervals and cost paid by landowner.

air pollution should be filtered to be kept to a minimum with standards set and inspected by the county as for water pollution. I do realize that processes and manufacturing that involve animals have odors involved but believe that the rights of residents come before those of processors and manufacturers.

FOR OFFICE  
USE ONLY

Date Received: 5-13-19

Date Reviewed: 5-13-19

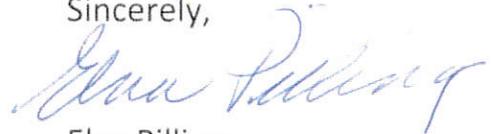
Complete:  Yes  No

roadway infrastructures changes necessary for any such growth should include adequate planning for merging existing and new infrastructures and upgrading existing infrastructures if necessary. Planning should include the effects of increased traffic in the affected area as well as those county wide, such as county maintenance of roads, roadside mowing, spraying , and snow removal and the costs involved.

effects on county schools, including additional buildings, school buses and bus routes with today's shortage of school bus drivers, etc. should also be considered.

These are the issues that I see, although I am certain that are more. I am putting my trust in you to do the best for the citizens of Cascade County.

Sincerely,



Elva Pilling

453-6467



# Public Comment Form

Cascade County Public Works Department Planning Division  
121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
Phone: 406-454-6905 | Fax: 406-454-6919  
Email: [planningcomments@casadecountymt.gov](mailto:planningcomments@casadecountymt.gov)

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## Commenter Information

Name: Carolyn K. Craven

Complete Address: 101 14th Avenue South, Great Falls MT 59405

## Comment Subject (please check one):

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  - 03.12.19 Cascade County Growth Plan Goals
  - 03.15.19 Zoning Definitions
  - 03.21.19 Planning Board Staff Report Growth Plan Goals
  - 03.23.19 Questions & Comments
  - 03.25.19 Miscellaneous Comments
  - 03.26.19 Opinion
  - Please note I agree with comments submitted by Tammie Lynne Smith, Conn & Naomi McElvey, Nate Kluz, Dr. Cheryl Reichert, Charles Boccock, Missouri River Citizens, Michael & Deborah Jenkins, Arlyne Reichert
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  - 04-25-19 Request Change in May 21 Meeting Purpose
  - 04-30-19 Rationale to Update 2014 Growth Policy
  - 05.07.19 Rationale for Public Participation in 2014 Growth Policy Revisions
  - 05.11.19 Meeting Times
  - 05.13.19 Initial Recommendations for Growth Policy Revisions

For Office Use Only			
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May 13, 2019

## PUBLIC COMMENTS ON CASCADE COUNTY GROWTH POLICY

### INITIAL RECOMMENDATIONS FOR GROWTH POLICY REVISIONS

In our daily news we are hearing about fires, floods, droughts and the unpredictability of climate change forecast fifty years ago. We have population increases in the state and are attracting tourism to this magnificent “last best place”. We have uncertainties about the sustainability of our fresh water sources. Our Growth Policy is due to have some significant revisions and additions. As a Montanan and citizen of Cascade County I respectfully request that the Planning Board recommend public input for revisions to the current Growth Policy. We as a community are well aware of the “elephant in the room” prompting our passion for public input for revisions to the Growth Policy. This is our home and we love Great Falls, Cascade County and Montana! Our Montana values include environmental health, community health, and preserving our natural resources. Public comments submitted to date provide a plethora of legal citations for public input in local government as well as the benchmarks needed to go beyond just review every five years and to revise the Growth Policy. To comply with those benchmarks<sup>1</sup> I submit that we are experiencing 1) “Significant changes in existing trends and conditions or projected trends”, 2) “Changes in the circumstances upon which the goals and objectives are based”, 3) “Changes in community goals”, 4) “Knowledge of specific and identifiable amendments that would improve the Cascade County Growth Policy’s usefulness so that it better serves the public”, and 5) “Public input suggesting the need to make changes”<sup>1</sup>. (5/9 Benchmarks)

<sup>1</sup>MCA 76-1-601 (3)(f) in 2014 Cascade County Growth Policy (p76) Please See Addendum I

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Current 2014 Growth Policy

- Contains five primary goals and objectives and seven specific goals and objectives
  - Primary Goals
    - Goal 1: Sustain and strengthen the economic well0being of Cascade County's citizens
    - Goal 2: Protect and maintain Cascade County's rural character and then community's historic relationship with natural resource development
    - Goal 3: Maintain agricultural economy
    - Goal 4: Retain the presence of the US Military in Cascade County
    - Goal 5: Preserve and enhance the rural, friendly, and independent lifestyle currently enjoyed by Cascade County's citizens
  - Specific Goals
    - Goal 6: Transportation
    - Goal 7: Wildfire and Fire Protection
    - Goal 8: Water Quality
    - Goal 9: Working Landscapes
    - Goal 10: Wildlife Habitat
    - Goal 11: Land Use
    - Goal 12: Support effort to ensure residents of Cascade County have an opportunity to obtain safe, sanitary and affordable housing
    - Goal 13: Protect areas near missile sites from encroachment and incompatible development

**I respectfully recommend that we add to, revise and change the above goals through widespread public participation, allowing thoughtful dialogue for the greater community to create a vision for the future of Cascade County. Another recommendation is to create a vision statement as a preamble to the growth policy. The vision statement would replace the current summary of the first five specific goals, which "summarize the citizen's aspirations for the future of our county".**

**One possible framework with suggested goals and objectives to begin the community conversation follows below.**

### Vision Statements

I respectfully suggest that as a greater county community we create a vision statement. Every successful business or organization has a vision and mission statement. Government entities are no different, and some cities and counties have a vision statement in the growth policy. A vision statement is a preamble to the growth policy. It is intended to describe what the growth policy hopes to achieve. It articulates the community's aspirations and describes how the county would like to be in the future. Based on public comments to date, we have common ground on protecting our unique open spaces, agricultural land for crop production and livestock grazing, natural resources, our aquifers and rivers, and our relatively clean environment.

We, as a greater community, have an opportunity to create a vision for a high quality of life for all residents, with access to good jobs in new and emerging industries; maintaining family farms, prime farmlands and grazing lands; sustaining our natural resources; maintaining environmental health; having access to educational and recreational opportunities; and being a prime destination for tourism.

To create such a vision statement would be part of the county-wide public outreach and public meetings that are already embedded in the Growth Policy revision process.

**"Because growth policies have a significant impact on the ability to develop private land, a thorough public involvement process is critical to formulating these strategies."**

*2014 Cascade County Growth Policy (p10)*

## RATIONALE AND RECOMMENDATIONS FOR ADDING AND REVISING GOALS

### ENVIRONMENTAL HEALTH

#### **GOAL 1      Maintain and enhance clean air, clean water, natural resources and a sustainable healthy environment now and into the future.**

*Rationale*      We face numerous uncertainties related to climate change. Managing climate change, rising energy costs, maintaining air and water quality are all important to a healthy, sustainable community and economy. Environmental issues do not respect political or geographic boundaries and need intergovernmental communication and collaboration. Any policies and goals related to climate change must be based on science and will likely be multi-faceted.

- Our complex environmental system includes water and air, but also soil and the type of energy we use. The water cycle includes floods and droughts, and air quality is affected by carbon and oxygen cycles plus several nutrient cycles. The location and type of development can alter these cycles and create imbalances.
- Montana has an abysmal history of Superfund sites due to mining and industry. Currently there are 28 Superfund sites in Montana in process of possible remediation, three of which are in Cascade County (ACM Smelter & Refinery, Barker Hughesville Mining District, Carpenter-Snow Creek Mining District). There are numerous peer-reviewed studies documenting land, water and air pollution associated with heavy industry and with industrialized animal production aka factory farms.
  - According to our MT Constitution, we have “the right to a clean and healthful environment”. With every right comes a responsibility. We, as residents in Cascade County, have a responsibility to plan wisely in order to maintain/improve the quality of our water, soils, and air so that we can enjoy a “clean and healthful environment”.

Environmental Health is the field of science that studies how the environment influences human health and disease. “Environment,” in this context, means things in the natural environment like air, water and soil, and also all the physical, chemical, biological and social features of our surroundings. [nlm.nih.gov/generic/11/what-is...] Retrieved 05.11.19.

### **OBJECTIVES**

- A. Encourage regional collaboration on environmental goals
- B. Maintain consistency in all zoning areas for prioritizing environmental goals
- C. Maintain and exceed current air quality standards
- D. Promote green building and green energy for all new buildings in any zoning district
- E. Allow for environmental assessments, soil studies and geotechnical surveys for development in areas where there is a reasonable expectation of environmental concerns, consistent with state law
- F. Incentivize and promote renewable, clean energy and energy efficiency standards as viable options in Cascade County

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- G. Encourage compact development, which uses land more efficiently and makes it easier for people to get around by walking, biking, or driving shorter distances, which reduces air pollution from vehicles and provides exercise.
- H. Coordinate with the state to monitor and test groundwater in areas near likely pollution sources
- I. Evaluate subdivisions and industry sites for impacts to surface and groundwaters, floodplains and riparian areas, and require appropriate mitigation
- J. Promote green building techniques, alternative clean energy sources, (wind and solar) elimination of coal mining or use in Cascade County, and decreased reliance on fossil fuel energy.
- K. Maintain clean air and water quality and monitor as needed for air pollution, water pollution, odor pollution and noise pollution.

## **WATER QUALITY**

### **GOAL 2      Protect our aquifers, rivers, surface water and groundwater from pollution.**

*Rationale*      We have issues of unpredictable climate changes, uncertainty about the sustainability of our aquifers, concerns about the sustainability of clean groundwater and surface water, increased water and air pollution, and the reminders of numerous Superfund sites in Montana.

- We have a responsibility to protect the environmental and visual integrity of our rivers, to protect residents from groundwater and surface water contamination, from pollution due to wastewater, runoff, and stormwater.

### **OBJECTIVES**

- A. Protect and sustain the rivers, surface water and groundwater for the economic, recreational and environmental well-being of all
- B. Assure septic systems are compliant with regulations to prevent groundwater contamination.
- C. Discourage development with on-site wastewater treatment systems in areas having inappropriate soils or high groundwater, as indicated on the revised Cascade County soil maps, to help prevent the contamination of groundwater supplies
- D. Promote education designed to further awareness of how waste water systems function, their proper maintenance and permitting requirements
- E. Require local review of subdivisions to meet Montana Department of Environmental Quality (MDEQ) regulations
- F. Encourage the formation of rural water districts and the development of community water systems by supporting funding applications for preliminary engineering and construction work
- G. Promote grants available to local organizations under section 319 of the Clean Water Act for the reduction of non-point source water pollution
- H. Promote education for land users on the necessity of obtaining appropriate permits before doing any work to alter streams
- I. Require all construction to be setback from streams and to be in compliance with applicable regulations, in order to prevent water quality degradation and stream bank erosion
- J. Promote policies that ensure greater setbacks for commercial, industrial, and multi-family development to reduce the risk of negative impacts

**MISSOURI RIVER CORRIDOR**

**GOAL 3      Develop and maintain a countywide plan to protect the river for the economic, recreational, and environmental well-being of all.**

*Rationale*      The Missouri River is our most valuable tangible natural resource. We must collaborate with the stakeholders throughout our county and state to develop the countywide plan referenced in a public comment below:

“Even though the County agreed to develop a countywide Missouri River Corridor Plan via the Missouri River City-County corridor plan adopted several years ago, that goal was omitted in the County Growth Policy Plan adopted May 14, 2014. Furthermore, the new Growth Policy Plan failed even to mention the value of protecting our rivers to the economic, recreational, and environmental wellbeing of all.” *From Public Comments March 26, 2019 By Missouri River Citizens*

**OBJECTIVES**

- A. Collaborate with the city of Great Falls, Missouri River Citizens, the state of Montana and other stakeholders to protect and enhance the quality of the water and sustain the long-term health and maintenance of the Missouri River
- B. Identify, stabilize and manage the Missouri’s floodplain and river bank so as to protect the river, its riparian assets and adjoining lands
- C. Implement best management practices for storm water
- D. Identify and remediate groundwater, point and non-point impacts, to the River’s water quality
- E. Prevent pollution from industries by planning the land use appropriately to minimize risk of pollution to the Missouri River
- F. Align the land use goals to allow protection of the Missouri River’s value as a public amenity and economic value for tourism and recreation
- G. Develop, maintain and enhance the River’s value as a public amenity and resource
- H. Promote and support the Missouri River Corridor as a National Heritage area
- I. Monitor downstream wastewater and stormwater
- J. Implement the *Missouri River Urban Corridor Plan* as the long-term vision for the river system,
- K. Support mixed-use and commercial development that will enhance the Missouri River consistent with the vision identified in the *Missouri River Urban Corridor Plan*

**ECONOMIC**

**GOAL 4      To sustain and strengthen the economic and social well-being of Cascade County citizens.**

*Rationale*      The city of Great Falls was recently recognized by *Livability* as #97/100 of the most livable cities out of more than 1,000 cities with populations between 20,000 and 1,000,000. A few years ago, Great Falls did not even make it to the top 1000. Great Falls scored high in the infrastructure and economics categories, due to the low cost of living and ease of getting around, according to *Livability*. “Great Falls is increasingly becoming a destination for entrepreneurs because it’s a welcoming and inspiring place for anyone looking to bring a new idea to life”. Great Falls was also recently recognized as #11 out of 300 cities studied with populations from 10,00 to 75,000. According to the report, “the cities were ranked based on education, travel time to work, income per capita,

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loans per capita, broadband access, and non-farm business”. In 2012 Great Falls was named “Small Business Community of the Year” by the U.S. Small Business Administration.

- Given the above information it seems reasonable to suggest that open spaces, magnificent scenery, the Missouri River and our clean environment contribute to these successes. Part of our mandate via the growth policy is to coordinate between the county and the city. Focusing on sustainable clean energy, sustainable family farms, non-polluting industries and supporting small business entrepreneurs throughout the county makes sense.
- What does NOT make sense is allowing massive industrialized animal production facilities, aka factory farms, that have a long track record, supported by peer-reviewed research, of polluting water, air and land, lowering property values in adjacent towns, lowering the average income in the county, and increasing crime. In addition, there are numerous studies on posing adverse environmental and health effects on adjacent communities and adverse effects on the social fabric of our communities.

## OBJECTIVES

- A. Focus on attracting sustainable small businesses
- B. Diversify base economy as the foundation for sustainable development
  - a. Encourage value-added crop commodities
  - b. Encourage non-polluting businesses and light industry
  - c. Encourage high tech and communications businesses
  - d. Encourage entrepreneurs in outdoor, recreational and historic tourism
  - e. Encourage diversification consistent with environmental goals
- C. Attract manufacturing and industries that preserve the quality of life and a healthy environment, while contributing to a sustainable economy that strengthens the community and invites growth.
- D. Encourage alternative energy research and development
- E. Stimulate the retention and expansion of existing businesses, new businesses, wholesale and retail businesses, and industries including agriculture, manufacturing, and forest products
- F. Collaborate with the public schools, local colleges, and Benefis Health to develop additional vocational tracks for technology, healthcare (i.e. telehealth), technical and engineering programs, clean energy development and other programs to support industry and to provide jobs that encourage graduates to live and work in Cascade County.
- G. Focus on quality of life as a key factor in economic growth

**The growth policy seeks to allow the market to benefit naturally from the desirable impacts of growth and land use changes, while protecting the community from the accompanying undesirable impacts and “ensuring the promotion of public health, safety, morals, convenience, order, or the general welfare”. (MCA 76-1-106).**

**LAND USE**

**GOAL 5**      **Protect and maintain Cascade County’s rural character, maintain agricultural land for crops and grazing, and protect the community from undesirable impacts of growth and land use.**

*Rationale*      Changes in land use are an inevitable result of growth and can fuel multiple segments of an economy. However, without careful planning, some land uses can have unintended deleterious impacts to the surrounding area. Appropriate land use planning will allow the market to benefit naturally from the desirable impacts of growth and land use changes if planning considers the adverse effects of proposed projects on water, air, land and community well-being.

- MCA 76-1-106: Land use planning should focus on “protecting the community from the accompanying undesirable impacts to public health, safety, morals, convenience, order or general welfare”.
- MCA 76-2-301. Zoning authorized “for the purpose of promoting health, safety, morals, or the general welfare of the community.”
- MT Growth Policy Resource Book: “It is especially important that environmental constraints for different types of land development activities and land use activities be identified. Key natural (i.e. prime agricultural lands, big game winter range, wetlands, floodplains) and historical or archaeological resources that may need additional protection or accommodation should also be identified.”

**OBJECTIVES**

- A. Ensure that the county zoning regulations protect the health, safety and overall well-being of the residents in the county
- B. Protect and maintain agricultural land for crop production and livestock grazing
- C. Protect the most productive soil types and protect soils against erosion
- D. Protect and maintain prime farmland and maintain in agricultural zoning
- E. Protect big game winter range
- F. Protect floodplains and wetlands
- G. Protect the floodplain from non-agricultural development
- H. Assess proposed land uses for adverse impacts on agriculture, natural environment, wildlife habits and public health and safety
- I. Diversify base economy as foundation for sustainable development
- J. Encourage diversification consistent with environmental goals
- K. Encourage non-polluting business and light industry
- L. Encourage high tech and communications businesses
- M. Encourage entrepreneurs in outdoor, recreational and historic tourism
- N. Maintain a land use database, including brownfield sites, to accommodate better planning and development in the county
- O. Ensure that allowed industrial uses avoid excessive noise, light, vibration, odors or sound impacts
- P. Prevent incompatible land use
- Q. Maintain the rural quality of life for the County’s current and future generations

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- R. Encourage cluster development to locate near existing towns and rural, more densely populated settlements and discourage poorly designed, unsafe land subdivisions and unsafe commercial development
- S. Promote appropriate land development in and around incorporated areas that can provide services and discourage inefficient land use patterns that make it difficult to provide public services
- T. Maintain land use and development that balances the many needs and interests without removing agriculture land for crop production and livestock grazing, while maintaining the rural quality of life for Cascade County's current and future generations
- U. Promote small businesses that are safe, attractive and accessible
- V. Encourage new development that is compatible with the character of adjacent cities, towns and rural communities.
- W. Prevent incompatible land uses that are likely to result in adverse impacts to the rural character of Cascade County and to the environmental quality of the county and the communities in it
- X. When making land use decisions, uphold provisions of the United States and Montana Constitutions that protect private property rights as well as the state constitutional rights of other area property owners to a clean and healthy environment

## **WILDLIFE HABITAT**

### **GOAL 6 Minimize impact to wildlife and fisheries.**

#### **OBJECTIVES**

- A. Encourage developers to coordinate with Montana Fish, Wildlife, and Parks in the pre-application phase to protect wildlife from negative impacts caused by development
- B. Encourage subdivision designs that do not restrict wildlife movement and preserve important wildlife habitat and corridors
- C. Direct homeowners to educational resources that provide strategies to avoid homeowner wildlife conflict
- D. Protect riverine habitat
- E. Achieve fish and wildlife habitat protection and restoration by coordinating with state, federal and local agencies

## **WORKING LANDSCAPES**

### **GOAL 7 Foster the heritage of the area in agriculture and forestry in recognition of their economic contribution and the intrinsic natural beauty of grazing areas, farmlands and forests.**

#### **OBJECTIVES**

- A. Encourage cooperation between new development and agricultural/forestry operations
- B. Educate prospective rural residents of potential conflicts with neighboring farm, ranch, and forestry operations
- C. Require appropriate fencing of rural residential developments to keep livestock out and allow free movement along traditional stock driveways
- D. Protect irrigation systems from the adverse impacts of rural residential development
- E. Ensure development plans provide protection from the introduction and spread of noxious weeds

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- F. Encourage open buffers between rural residences and adjoining agricultural lands
- G. Encourage agricultural landowners considering land subdivision to develop the least agriculturally viable portion of their properties
- H. Encourage in-fill development of urban and transitional areas already committed to development where community facilities and services can be provided cost-effectively in order to reduce development pressure on agricultural lands

## **COMMUNITY HEALTH**

### **GOAL 8 Utilize environmental, social and economic resources to sustain emotional and physical well-being in ways that advance the goals and satisfy the needs of citizens in Cascade County**

*Rationale* The health of our county-wide community can be affected by planning and zoning, as can the health of future generations. Community health includes a clean environment, access to fresh food, medical care and prescription medicines, transportation, housing, recreation and social connections.

#### **OBJECTIVES**

- A. Provide ease of access to healthcare providers and prescription medications
- B. Expand access to a locally produced fresh food supply through local agricultural suppliers, farmer's markets and community gardens
- C. Promote environmental educational opportunities and values in the county
- D. Encourage growth of community centers in rural and urban areas and ensure adequate highway, utility, and health, educational and recreational facilities
- E. Improve the quality of life for residents in the county and ensure open spaces, fresh food access, good air quality and clean water
- F. Work with area agencies, schools, local & state governments to improve the services offered to at risk youth with mental disabilities and/or chemical dependencies.
- G. Provide education about nutrition and exercise
- H. Encourage family gardens
- I. Strengthen local markets
- J. Provide transportation choices
- K. Support productive agriculture for a variety of markets

## **HOUSING**

### **GOAL 9 Support effort to ensure residents of Cascade County have an opportunity to obtain safe, sanitary and affordable housing.**

#### **OBJECTIVES**

- A. Promote energy efficiency in new and existing structures
- B. Develop housing that minimizes impacts on natural resources and maximizes social resources
- C. Support and expand availability of safe housing for all residents, especially those with special needs or disabilities, senior citizens and those who are homeless
- D. Coordinate with nonprofit agencies to maximize housing resources for low-income residents

**TRANSPORTATION**

**GOAL 10**      **Promote and maintain a transportation system that is cost-effective, safe, efficient and uses clean energy when possible.**

**OBJECTIVES**

- A. Identify and support alternative modes of transportation
- B. Minimize use of petroleum products and emissions of greenhouse gases by promoting transportation choices and efficient land use patterns
- C. Meet the unique transportation needs of the county's elderly, disabled and disadvantaged populations
- D. Create a multi-modal transportation, open space and infrastructure system that promotes increased opportunities for walking, biking, and public transit
- E. New additions to the transportation system should be compatible with the existing road system and coordinated with roads from other jurisdictions
- F. Transportation planning for new developments should support the Cascade County Growth Policy
- G. Ensure that all new roads, both public and private, are built to county design standards for new construction. These standards can be found within the Cascade County Subdivision Regulations.
- H. Encourage provisions for multi-modal types of transportation including: bike lanes, trails, pedestrian facilities, etc.
- I. Develop and implement road and bridge improvement standards and maintenance schedules

**TOURISM**

**GOAL 11**      **Promote the open spaces, magnificent vistas, scenic and historic landmarks and recreational destinations in Cascade County.**

Rationale      Tourism is an economic asset, drawing visitors as well as potential employers and future residents to the county and contributing significantly to the quality of life that is characterized by natural scenic beauty, clean air and water and access to outdoor and recreational opportunities

**OBJECTIVES**

- A. Maintain and protect cultural and historic resources, recognizing they are an important and irreplaceable asset for the county and for tourism
- B. Promote recreational activities in the county
- C. Maintain and protect cultural and historic resources that invite tourism
- D. Support music and special events that attract tourism
- E. Develop and support social media to share the value of Cascade County as a destination
- F. Support communities by providing grant writing and technical assistance to communities that promote Cascade County as a tourism destination

**WILDFIRE AND FIRE PROTECTION**

**GOAL 12**      **Minimize risk of fire by management and planning, and to permit the effective and efficient suppression of fires in order to protect persons, property and forested areas.**

Rationale      With the unpredictability of droughts and wildfires and increases in regional wildfires it is our responsibility to develop a management plan for wildland fires, including delineation of the wildland-urban interface; and adoption of regulations that requires defensible space for structures, ingress and egress to facilitate fire suppression and adequate water supplies and manpower for fire protection.

**OBJECTIVES**

- A. Preserve and promote Cascade County's rich cultural heritage, rooted in natural resource development and reflected in its numerous cultural/historic sites and archaeological areas
- B. Encourage fire protection measures throughout the county, giving special emphasis to the extreme fire hazards at the wild land/urban interface
- C. Subdivisions should be planned, designed, constructed and maintained so as to minimize the risk of fire
- D. Developers should submit a defensible space plan for each subdivision to the appropriate fire district for its review
- E. Encourage fire resistant construction materials and the use of sprinkler systems
- F. Promote cooperation with local fire districts and state and federal agencies to develop and provide a wildfire educational program
- G. Promote fire services for all subdivisions
- H. Promote adequate water supply systems

**PUBLIC SERVICES**

**GOAL 13**      **Services that benefit all the people in urban or rural communities**

Rationale      Public services are integral to the health and well-being of our county's residents. Public services include law enforcement, fire protection, emergency services, solid waste disposal, sewer services, wastewater management, water quality, quality public education, parks and recreation areas.

**OBJECTIVES**

- A. Provide fire, police and emergency services
- B. Maintain public safety
- C. Maintain park facilities, open spaces and recreational opportunities for all residents
- D. Provide communications via telephone and internet
- E. Maintain roads, streets and safe walking routes between homes and schools
- F. Ensure safe drinking water and wastewater treatment
- G. Provide utility easements and essential utilities such as electrical service and telephone service

NOTE: No changes in this except combining into one goal with two divisions in objectives.

## **MALMSTROM AIR FORCE BASE**

**GOAL 14      Retain the presence of the US Military in Cascade County and protect areas near missile silos from encroachment and incompatible development.**

### **OBJECTIVES**

*Retain the presence of the US Military in Cascade County*

- A. Encourage the federal congressional delegation to actively support maintaining the current mission status at a minimum.
- B. Promote the location of additional military missions in Cascade County.
- C. Encourage the reactivation of the runway at Malmstrom Air Force Base for fixed wing operations.
- D. Refer to the Joint Land Use Study for resolving conflicts and promoting mission compatible development.

*Protect areas near missile silos from encroachment and incompatible development*

- A. Discourage intensive development, density increases, and further subdivision of land in the Yellow-coded Development Coordination Area (DCA). See Figure 2-1. The Development Coordination Map identifies three types of areas where development should be monitored and coordinated to determine any potential impacts to the military mission. There are two areas where no development should occur: the RYG Red Layer – LF (covering all land within a 1,200-foot radius of the Missile Launch Facilities) and the RYG Red Layer – MAF (covering all land within a 1,200-foot radius around the Missile Alert Facilities). The remaining RYG Yellow Layer covers lands within the communication (electronic “line-of-site” for transferring information between facilities) and transportation (helicopter flight paths between facilities) corridors where any development should be coordinated and monitored to ensure no impacts to the communication or transportation needs of the military.
- B. Encourage development proposals to coordinate plans with the Malmstrom Air Force Base (MAFB) if the proposed development indicates a potential for incompatibility with mission.
- C. Maintain a formal process in concert with MAFB for coordinating the development review effort between Cascade County and MAFB
- D. Maintain local regulations for promoting compatible land use as recommended in the Joint Land Use Study (JLUS).
- E. Encourage the use of easements to conserve lands near missile silos.
- F. Encourage and support citizen-led land conservation easement efforts.
- G. Determine willingness of property owners to deed land and or/establish conservation easements
- H. If appropriate, establish a property trust and/or conservation easement program with those landowners.
- I. Educate landowners and others about encroachment issues and incompatible land uses in vicinity of missile silos.
  - 1. Prepare a brochure, fact sheet and/or a newsletter that raises public awareness about encroaching onto missile silo sites. Regularly distribute this document to land owners, Chambers of Commerce, libraries, community service organizations, real estate offices, BCB, county and city offices and departments.

2. Maintain a webpage on the county's website that addresses issues relative to military compatibility.
  3. Prepare maps for placement on the county website delineating areas where there are special concerns about encroachment or incompatibility.
  4. Publicize the functions, duties and responsibilities of the office of the MAFB Base Community Planner.
  5. Utilize public community events to provide information about encroachment and compatibility issues and provide opportunities questions and answers.
  6. Work with the local realtor's association to require a disclosure statement upon the sale of fee simple land where areas of concern are indicated on the Figure 2-1.
- J. Maintain communications between Cascade County and MAFB and the Montana Building Codes Bureau (BCB)
1. Study, evaluate and prepare a report for County Commissioners on ways to improve communication and coordination between the County and MAFB.
  2. Study, evaluate and prepare a report for County Commissioners on ways to improve communication and coordination with the BCB.
  3. Develop a formal notification process for building permits issued by the BCB.

### **COUNTY-CITY INTERFACE**

**GOAL 15      Coordinate and cooperate with the city of Great Falls, Malmstrom Airforce Base, and incorporated towns in Cascade County on matters related to the growth policy**

#### **OBJECTIVES**

- A. Align and coordinate Great Falls Growth Policy Goals and Cascade County Growth Policy Goals to foster a healthy environment, sustainable economic development and the well-being of Cascade County citizens
- B. Encourage regional collaboration on clean energy development, elimination of coal-produced energy, and decreased reliance on fossil fuel energy
- C. Collaborate on county-city emergency preparedness
- D. Consider and pursue partnerships such as projects that support the implementation of the *Missouri River Urban Corridor Plan*
- E. Collaborate regularly in development of an urban and rural Missouri River Corridor Plan
- F. Coordinate with incorporated cities within the county on issues related to rural-urban interface and the potential threat of wildfires
- G. Coordinate planning and service provision efforts with incorporated cities within the county and with neighboring counties to direct development to existing developing areas
- H. Conserve hydrological resources
- I. Protect the natural environment, including critical wildlife resources
- J. Utilize a collaborative approach to economic development that enhances quality of life in communities

**PUBLIC PARTICIPATION**

**GOAL 16** A process that directly engages the public in decision-making and gives full consideration to public input in making that decision

**OBJECTIVES**

- A. Invite the public via public notices to participate in the five-year review of the Growth Policy and make recommendations as to the need for any revisions.
- B. Include other venues for public notices in addition to the legal notices in the Great Falls Tribune.
- C. Offer later times and appropriate venues for public comments.

*Notice and Opportunity to be Heard*

"Each board must develop procedures and adopt rules to facilitate public participation in decisions that are of significant interest to the public (MCA 2-3-103). The procedures include a schedule of regular meeting times and agenda prepared and posted sufficiently in advance to provide notice of the topics to be discussed and actions to be considered. The public must also be afforded a reasonable opportunity to offer information and opinions, either orally or written, before final decisions are made. A matter of significant public interest is defined as one "involving any non-ministerial decision or action...which has meaning to, or affects a portion of the community."<sup>13</sup> Discrepancies as to whether a meeting is of a significant public interest should always err on the side of transparency and opportunities for public participation... **There is no violation in the law by giving more notice or opportunity to be heard than is required.**" ☺

13 Opinions of the Attorney General. 1998. Montana Department of Justice, Legal Services Division. 47 Op. Att'y Gen. No. 13

<http://www.doj.mt.gov/resources/opinions1998/47-013.asp>

MT Local Government Handbook 2011 (p13)

**"Since the goals and objectives are the foundation of the growth policy, broad public participation in the formation of those goals and objectives is crucial to assure the success in developing and implementing the policy. Public participation in local decisions is fundamental to our democratic process of government. Public participation cannot be ignored, or poorly planned and carried out."** [MT Growth Policy Resource Book 2009]

Respectfully submitted,



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## ADDENDUM 1

From Public Comments 04.30.19

### 2014 GROWTH POLICY

“At least once every five years after adoption, the Cascade County Planning Board will review the Cascade County Growth Policy to determine if revisions are necessary, as required by 76-1-601 (3)(f) MCA. The basis for such determination whether to revise the Cascade County Growth Policy will include an assessment of the following issues” (p76).

(Total of nine issues with five discussed below)

Significant changes in existing trends and conditions or projected trends.

Having proposed zoning changes eliminating Agriculture zoning is a significant change and has generated numerous public comments. Projected trends include the uncertainties of climate change and the uncertainties of how sustainable the Madison Aquifer is.

Changes in the circumstances upon which the goals and objectives are based.

The proposed zoning changes allowing large scale industrialized animal production is a significant change in direction and mandates a thoughtful and thorough dialogue about the kind of future citizens of Cascade County would like to see.

Changes in community goals.

The citizens of Cascade County have not had an opportunity to formulate a vision for the next five years, which likely will involve changes. Public input has been provided opposing the significant proposed zoning changes.

Public input suggesting the need to make changes.

There has been significant public input regarding maintaining agricultural zoning and opposing the proposed zoning changes, including opposing industrialized animal production, as well as maintaining our open spaces, clean water and air.

Knowledge of specific and identifiable amendments that would improve the Cascade County's Growth Policy's usefulness, so that it better serves the public.

Recommended amendments are in process for this public comment period.

## ADDENDUM II

From Public Comments 05.07.19

### ADDITIONAL INFORMATION

One of the most important phases of a growth policy is the articulation of community goals and objectives for our county. A “community visioning process” is one of the processes through which our county imagines the future it most desires and then plans to achieve those goals. Broad public participation is crucial to assure the success in this revision process. Public participation in local decisions is fundamental to our democratic process of development. *MT Growth Policy Resource Book 2009*

Growth policies that reflect the vision of a community through citizen participation and that comply with Montana’s statutory requirements will generally withstand most legal challenges. The Montana Environmental Quality Council report, *Planning for Growth in Montana*, identified several benefits of community planning, including the following:

- *Makes communities safer and healthier by encouraging well-designed streets, protecting water quality, and deterring development in unsuitable areas such as floodplains, wetlands, fault zones, and unstable slopes.*
- *Protects special community values, such as historic, cultural, scenic and natural features, or rural agricultural character.*
- *Builds public consensus and greater understanding of issues within the community.*
- *Maintains property values for residential, commercial, and industrial properties by preventing nearby incompatible or degrading uses.*

Good public participation can highlight concerns and issues not always apparent to the local planners or officials. It can provide a voice for diverse interests and helps a community “buy into” the reasons for a growth policy or revision. If the public has been part of the process then they will have “ownership” of the final document. An additional benefit of public participation is that when properly documented, it gives significant legal support to the growth policy when it is officially adopted by local government.

There are many methods that can be used to encourage public participation. Informal neighborhood and town meetings, citizen surveys and questionnaires, media coverage, open houses, distribution of printed materials, presentations to civic groups, and public hearings are just a few options. The Montana Department of Commerce, Community Development Block Grant (CDBG) Program, has published a booklet entitled *The Community Needs Assessment Process*, which describes several different methods for encouraging public involvement and obtaining public input. This publication also includes examples of some of the creative ways in which Montana communities have involved the public in the process of identifying community needs and goals and objectives.

*(From website: <http://comdev.mt.gov/>)*

#### **A Growth Policy is:**

A community **vision** for how it sees its **future**

A community **vision** for **how** and **where** it wants to **grow**

**An official statement of public policy** to guide growth and change

**A dynamic document** that **changes** with the community

C.K. Craven  
Homeowner



# Public Comment Form

Cascade County Public Works Department Planning Division  
 121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
 Phone: 406-454-6905 | Fax: 406-454-6919  
 Email: [planningcomments@casadecountymt.gov](mailto:planningcomments@casadecountymt.gov)

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## Commenter Information

Name: TAMMIE LYNNE SMITH

Complete Address: 397 HIGHWOOD ROAD, GREAT FALLS, MT 59405

## Comment Subject (please check one):

- Special Use Permit Application       Subdivision       Zoning Text and/or Map Amendment  
 Growth Policy       Variance       Floodplain Regulation Amendment  
 Subdivision Regulation Amendment       County Road Abandonment/ Discontinuation of County Street  
 Other (describe): CHANGES IN GOALS AND OBJECTIVES

## Comment

TO: PLANNING STAFF, PLANNING BOARD, COUNTY ATTORNEY

MCA 76-1-106 defines the role of planning boards, including the preparation of a growth policy, in an advisory capacity to the local governing bodies. Once a growth policy is created and adopted by the local governing body, MCA 76-1-601(3)(f) requires the local government to review the growth policy at least once every five years and revise the policy as necessary. This part also requires a list of conditions that will lead to a revision of the growth policy be provided in the policy's implementation strategy.

The third, fourth, fifth, and eighth condition in the CCGP for making a determination whether to revise the policy centers changes in the circumstances upon which the goals and objectives are based, community goal changes, the plausibility to achieve stated goals and objectives, and public input. Attached are my comments concerning shortfalls in the implementation strategy of the Cascade County Growth Policy and proposed clarification and revision actions  
 SEE ATTACHED: CHANGES IN GOALS AND OBJECTIVES

For Office Use Only			
Date Received:	<u>5-13-19</u>	Date Reviewed:	<u>5-13-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Cascade County Planning Board  
325 2<sup>nd</sup> Ave N  
Great Falls MT

**DETERMINING IF CHANGES IN THE CIRCUMSTANCES UPON WHICH THE GOALS AND OBJECTIVES ARE BASED,  
CHANGES IN COMMUNITY GOALS  
PLAUSIBILITY AND ABILITY OF THE COUNTY TO ACHIEVE STATED GOALS AND POLICIES  
PUBLIC INPUT SUGGESTING THE NEED TO MAKE CHANGES**

*The Cascade County Growth Policy serves as a comprehensive plan to provide guidance on decisions regarding land development and public investments. This document is non-regulatory and is only implemented through regulatory tools such as Subdivision, Zoning, and Floodplain Regulations or similar ordinances enacted by the Cascade County Board of Commissioners. Because growth policies have a significant impact on the ability to develop private land, a thorough public involvement process is critical to formulating these strategies. The Cascade County Growth Policy is a living document that is reviewed and updated periodically in order to address changes within the community that may alter the considerations for land development and public investment. (CCGP Page 1-1)*

The Cascade County Growth Policy will be reviewed by the Cascade County Planning Board at their annual meeting each year. At that meeting the Planning Director will present any recommendations for revisions to the growth policy. (CCGP Page 9-1)

At least once every five years after adoption, the Cascade County Planning Board will review the Cascade County Growth Policy to determine if revisions are necessary, as required by 76-1-601(3)(f) MCA. The basis for such determination whether to revise the Cascade County Growth Policy will include an assessment of the following issues. (CCGP Page 10-1)

- ❖ Changes in the circumstances upon which the goals and objectives are based
- ❖ Changes in community goals
- ❖ Plausibility and ability of the County to achieve stated goals and policies.
- ❖ Public input suggesting the need to make changes

The Cascade County Growth Policy is designed to help guide community decision-making in its effort to achieve the goals and objectives of our unique community. The CCGP is a *living document* that requires periodic review and update to deal with changes in the community that may alter the considerations for land development and public investment. (CCGP Page 1-1)

The Goals and Objectives of the CCGP are the *principle elements* in guiding the Planning Board. The goals and objectives were first established in 1982 summarizing the citizens' aspirations for their community. Additional goals were identified and added to the 2006 CCGP and continue to provide the best overall direction for county planning. The JLUS recommendations and other minor changes were made in 2013, adopted in 2014. (CCGP Page 2-1)

Goals, and the objectives used to achieve them, must be examined regularly to ensure they are relevant and attainable. The support data, trends, and projection information used in the 1982, 2006, and 2013 goal setting exercises is outdated and in many cases bears little resemblance to Cascade County in 2019. Population, Housing, Economic Conditions, and much of the Local Services provisions have changed over time. Changes in these important indicators and circumstances have an impact on the county's goals and the detailed objectives in support of them.

Although emphasis is made in Chapter 1 Introduction and Chapter 2 Goals and Objectives, on citizen and community participation in the development of the growth policy there has been no further discussion by the Cascade County Commissioners, the Planning Division, or the Planning Board to update the growth policy since 2014 or encourage the public to consider a review and update of the policy. Therefore, to include "Changes in community goals" as a basis to determine the need to revise the CCGP is contradictory.

The Planning Board cannot determine *if* the citizens of Cascade County have suggestions or see a need to review and update the CCGP without having the opportunity to express those concerns.

Goals, and their detailed objectives, are only as good as the measurable standards used to determine their completion or success. The goals and objectives of the 2014 CCGP are admirable. Sustaining economic well-being, preserving and enhancing rural characteristics, maintaining agriculture and the military presence, promoting adequate transportation, minimizing wildfire and fire protection, ensuring water quality, working landscapes, and wildlife habitat, and quality housing opportunity for all are commendable.

The five year growth policy review requirement, as set forth in MCA §76-1-601(3)(f), is an excellent opportunity to identify those goals and objectives that have been successfully implemented and provided benefit to the community from those that haven't. The citizens of Cascade County, as well as its elected officials and staff, need to understand what works and what doesn't before realistic dialogue can be established addressing the short and long-term vision for the county. This review could have been more easily managed if it had been done as part of the Planning Board's annual review as described on page 9-1.

The citizens of Cascade County are regularly forced into a defensive position when questioning or challenging a county driven policy, ordinance, or regulation. A spirit of cooperation no longer exists between elected or appointed officials, county staff, and the public. Why not use the required review and update of the Cascade County Growth Policy, with full public participation, as a starting place to heal old wounds and develop a new mutually beneficial sense of cooperation in Cascade County?

**Proposed Actions:**

1. Commit to a review and update of the Cascade County Growth Policy.
2. Establish county resources necessary to review the CCGP.
3. Reach out to community leaders and interested citizens to create a working group.
4. Provide information on policies, regulations, ordinances, and other county actions implemented to satisfy goals and objectives since 2012.
5. Review and consider Growth Policy's implemented by other Montana governing bodies.

Tammie Lynne Smith  
397 Highwood Road  
Great Falls, MT 59405



Date: 5-13-19  
To: Cascade County Planning Staff and Board  
From: Deborah and Mike Jenkins  
298 Hastings Road  
Re: Public Comment Regarding Cascade County Growth Policy

Please pardon this submission at the end of your requested deadline. We have been traveling and have not had time to fully address this very important topic. With that said:

- We would like to request that you allow for additional time for the public to contribute comments. Please consider extending this discussion to at least the June Board meeting.
- We would again like to request that you conduct these Board meetings later in the day, to accommodate more citizens that work during the normal business hours. The meeting that was held at 4:30 pm, in the larger facility at the Fairgrounds, demonstrated a more successful public participation event. We also would like to request these are scheduled in larger meetings areas.
- We believe that the CCGP does need a thorough review right now, with thoughtful public input strongly considered. This is a cornerstone document that guides so many decisions and it should not be rushed or bulldozed by anyone that has an individual agenda pending the outcome.
- We have had opportunity to read Carolyn Craven's comments dated 4/15/19, 4/30/19, and 5/7/19 and agree with her opinions. We respectfully submit "me too" in agreement.
- We have not completed our review of the CCGP and will not be able to submit our comments by the end of today, your deadline. We will submit them later after we have completed thoughtful responses.
- With all due respect, it is our suggestion that you consider outsourcing this project and hiring a professional land use consultant. It has been presented a number of times that staff is stretched thin, and the Administrator position has yet to be filled. Although we are sure that your interim Administrator is doing his best and we commend him for tackling this position, it can't be easy for him to step in fully and be able to lead the team as effectively as would be possible with an experienced and permanent Administrator hired. Hiring an experienced consultant during this gap period to help drive this project productively and effectively forward seems wise to us and we hope that you consider it.

Thank you for your consideration and for your valuable work for our county,

Deborah and Mike Jenkins



# Public Comment Form

Cascade County Public Works Department Planning Division  
 121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
 Phone: 406-454-6905 | Fax: 406-454-6919  
 Email: [planningcomments@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov)

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## Commenter Information

Name: TAMMIE LYNNE SMITH

Complete Address: 397 HIGHWOOD ROAD, GREAT FALLS, MT 59405

## Comment Subject (please check one):

- Special Use Permit Application     
  Subdivision     
  Zoning Text and/or Map Amendment  
 Growth Policy     
  Variance     
  Floodplain Regulation Amendment  
 Subdivision Regulation Amendment     
  County Road Abandonment/ Discontinuation of County Street  
 Other (describe): SIGNIFICANT CHANGES IN EXISTING TRENDS AND CONDITIONS OR PROJECTED TRE

## Comment

TO: PLANNING STAFF, PLANNING BOARD, COUNTY ATTORNEY

MCA 76-1-106 defines the role of planning boards, including the preparation of a growth policy, in an advisory capacity to the local governing bodies. Once a growth policy is created and adopted by the local governing body, MCA 76-1-601(3)(f) requires the local government to review the growth policy at least once every five years and revise the policy as necessary. This part also requires a list of conditions that will lead to a revision of the growth policy be provided in the policy's implementation strategy.

The second condition in the CCGP for making a determination whether to revise the policy is significant changes in existing trends and conditions or projected trends. Attached are my comments concerning shortfalls in the implementation strategy of the Cascade County Growth Policy and proposed clarification and revision actions.

SEE ATTACHED: CHANGES IN TRENDS CONDITIONS OR PROJECTED TRENDS

### For Office Use Only

Date Received:	<u>5-13-19</u>	Date Reviewed:	<u>5-13-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Cascade County Planning Board  
325 2<sup>nd</sup> Ave N  
Great Falls MT

## DETERMINING IF SIGNIFICANT CHANGES EXIST IN TRENDS AND CONDITIONS OR PROJECTED TRENDS

*The Cascade County Growth Policy serves as a comprehensive plan to provide guidance on decisions regarding land development and public investments. This document is non-regulatory and is only implemented through regulatory tools such as Subdivision, Zoning, and Floodplain Regulations or similar ordinances enacted by the Cascade County Board of Commissioners. Because growth policies have a significant impact on the ability to develop private land, a thorough public involvement process is critical to formulating these strategies. The Cascade County Growth Policy is a living document that is reviewed and updated periodically in order to address changes within the community that may alter the considerations for land development and public investment. (CCGP Page 1-1)*

The Cascade County Growth Policy will be reviewed by the Cascade County Planning Board at their annual meeting each year. At that meeting the Planning Director will present any recommendations for revisions to the growth policy. (CCGP Page 9-1)

At least once every five years after adoption, the Cascade County Planning Board will review the Cascade County Growth Policy to determine if revisions are necessary, as required by 76-1-601(3)(f) MCA. The basis for such determination whether to revise the Cascade County Growth Policy will include an assessment of the following issues. (CCGP Page 10-1)

### ❖ Significant changes in existing trends and conditions or projected trends.

The current CCGP was adopted in May 2014 using data and analysis that was two to five years old. The findings of this data and analysis were used to project trends, establish assumptions, and create a vision for growth and development. The Goals, Objectives, and Implementation Strategies were specifically developed to ensure and hold both county staff and citizens accountable to the future vision of Cascade County.

The data and analysis are now seven to ten years old. The economy has change in Montana and Cascade County. Assumptions, trends, and projections need revision and update. I believe when these two steps are completed it will be clear that some of the County's goals will also need to be revisited and adapted for 2019 through 2024.

In an email dated Thursday, May 02, 2019, at 4:35 pm, acting Planning Administrator Ian Payton wrote the following:

*"The current CCGP document has not brought up areas of concern in its interaction with day-to-day County operations. This leads Planning to view a hold-up of CCZR revision process as unwarranted." If an update to the CCGP is determined to be warranted, the process could be lengthy and waiting until hard 2020 census numbers are released is advisable rather than using estimates currently available."*

I will address Mr. Payton's statement that the CCGP has not caused concern with day-to-day County operations in a separate public comment. However, I disagree with Mr. Payton's assertions concerning an update to the Cascade County Growth Policy be postponed until the 2020 U.S. Census data is completed.

Chapter 3 – Population, Chapter 4 – Housing, and Chapter 5 – Economic Condition of the May 2014 CCGP utilized a broad array of data from many sources, just one of which was U.S. Census data. Following are a number of current sources that could be explored and used to update the basis of analysis for the 2019-2024 Cascade County Growth Policy.

Population and Population Trends

U.S. Census Bureau Quick Facts includes population estimates and changes, and population characteristics up to July 01, 2018. <https://www.census.gov/quickfacts/fact/table/cascadecountymontana>  
 Suburban Stats includes additional information obtained from the U.S. Census Bureau. <https://suburbanstats.org/population/montana/how-many-people-live-in-cascade-county>  
 MT Census and Economic Information Center provides population data through 2017. <https://ceic.mt.gov/Data>

Housing and Housing Trends

U.S. Census Bureau Quick Facts includes housing data through 2017. <https://www.census.gov/quickfacts/fact/table/cascadecountymontana>  
 White Paper on Housing in Montana updated 2012. <https://housing.mt.gov/Portals/93/shared/docs/HousingDivision/WhitePaper/2012WhitePaper.pdf>  
 US Census Bureau 2018 American Community Survey

Economic Condition and Trends

2018 Montana Economic Report <http://www.bber.umt.edu/pubs/seminars/2018/EconRpt2018.pdf>  
 Bureau of Labor Statistics. [https://www.bls.gov/eag/eag.mt\\_greatfalls\\_msa.htm](https://www.bls.gov/eag/eag.mt_greatfalls_msa.htm)  
 Sweetgrass Development: Comprehensive Economic Development Strategy 2017-2021  
 USDA Agricultural Statistics [https://www.nass.usda.gov/Statistics\\_by\\_State/Montana/Publications/Special\\_Interest\\_Reports/agfacts.pdf](https://www.nass.usda.gov/Statistics_by_State/Montana/Publications/Special_Interest_Reports/agfacts.pdf)  
 Montana Ag Statistics 2018 [https://www.nass.usda.gov/Statistics\\_by\\_State/Montana/Publications/Annual\\_Statistical\\_Bulletin/2018/Montana-Annual-Bulletin-2018.pdf](https://www.nass.usda.gov/Statistics_by_State/Montana/Publications/Annual_Statistical_Bulletin/2018/Montana-Annual-Bulletin-2018.pdf)

**Proposed Actions:**

1. Develop a comprehensive plan to review and update the data and analysis used in Chapter 3 Population, Chapter 4 Housing, and Chapter 5 Economic Condition.
2. Using current data and trend projections reassess the significant findings in Chapters 3-5 to determine the impact the updated information has on the county's goals and objectives.
3. I have reviewed the current data and compared it to the trends and projections in the 2014 CCGP.
  - a. The population of Cascade County has not increased as previously projected. The total population has remained static. The age distribution of the population has also remained fairly constant.
  - b. Rural farm populations have not decreased due to consolidation as quickly as forecasted.
  - c. Distribution of age throughout Cascade County has not shifted dramatically.
  - d. Housing Units in Cascade County have increased modestly since 2010. Owner occupied housing units have increased indicating more resident permanence. The median value of owner-occupied housing units has also increased.
  - e. Agriculture continues to be the primary economic contributor in Cascade County. The data suggests significant changes in the value of farming and crops within the county. The CCGP singular focus on the Sweetgrass CEDS falls short of providing true economic condition data for this unique county.
  - f. Military employment is unchanged, however, non-military government employment has decreased. An analysis of non-government employment in the GF School District should be further explored.
4. Updates in Chapter 6 Local Services are needed to better assess the county's areas of concern. Particular attention should be directed to 6.2 Water Supply and projected trends based on both residential and industrial development, 6.5 Fire Protection updates, and 6.6 School Districts current and future enrollment and potential upgrade needs.



# Public Comment Form

Cascade County Public Works Department Planning Division  
 121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
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Complete Address: 397 HIGHWOOD ROAD, GREAT FALLS, MT 59405

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 Growth Policy       Variance       Floodplain Regulation Amendment  
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 Other (describe): CHANGES IN THE LEGAL FRAMEWORK OF THE GROWTH POLICY OR ITS IMPLEMENTI

## Comment

TO: PLANNING STAFF, PLANNING BOARD, COUNTY ATTORNEY

MCA 76-1-106 defines the role of planning boards, including the preparation of a growth policy, in an advisory capacity to the local governing bodies. Once a growth policy is created and adopted by the local governing body, MCA 76-1-601(3)(f) requires the local government to review the growth policy at least once every five years and revise the policy as necessary. This part also requires a list of conditions that will lead to a revision of the growth policy be provided in the policy's implementation strategy.

The first condition in the CCGP for making a determination whether to revise the policy is changes in the legal framework of the growth policy or it's implementation. Attached are my comments concerning shortfalls in the implementation strategy of the Cascade County Growth Policy and proposed clarification and revision actions.

SEE ATTACHED: DETERMINING CHANGES IN THE LEGAL FRAMEWORK OF THE GROWTH POLICY OR IT'S IMPLEMENTATION

### For Office Use Only

Date Received:	<u>5-13-19</u>	Date Reviewed:	<u>5-13-19</u>	Complete:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Cascade County Planning Board  
325 2<sup>nd</sup> Ave N  
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## DETERMINING CHANGES IN THE LEGAL FRAMEWORK OF THE GROWTH POLICY OR IT'S IMPLEMENTATION

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The Cascade County Growth Policy will be reviewed by the Cascade County Planning Board at their annual meeting each year. At that meeting the Planning Director will present any recommendations for revisions to the growth policy. (CCGP Page 9-1)

At least once every five years after adoption, the Cascade County Planning Board will review the Cascade County Growth Policy to determine if revisions are necessary, as required by 76-1-601(3)(f) MCA. The basis for such determination whether to revise the Cascade County Growth Policy will include an assessment of the following issues. (CCGP Page 10-1)

- ❖ **Changes in the legal framework regarding the Cascade County Growth Policy or its implementation.**  
The current CCGP was originally developed in 2005-2006 to comply with Senate Bill 326 and MCA §76-1-601. In 2012, Cascade County and other Malmstrom AFB Missile Complex Counties completed a Joint Land Use Study (JLUS) to identify potential conflicts between development and military missions. The resulting language changes were incorporated along with several *minor* updates in 2013. Following the required public comment period, Cascade County adopted the changes recommended. When finally adopted on May 27, 2014 it was noted, “more extensive updates to the Growth Policy may require a possible rewrite with additional public participation in the future.” (CCGP Page 1-3).

Chapter 9 includes the required Implementation Strategy for the growth policy. The strategy includes (1) a timetable for reviewing the growth policy at least once every five years and revising the policy, if necessary and (2) the Cascade County Growth Policy will be reviewed by the Cascade County Planning Board at their annual meeting each year. As noted above, Chapter 10 of the CCGP restates the requirement to review the policy every five years to determine if revisions are necessary, as required by MCA §76-1-601(3)(f) and provides a list of conditions that will lead to a revision of the growth policy.

I have reviewed the Annual Report to the Cascade County Planning Board for 2017 and 2018 and the Minutes of the Hearings corresponding to the presentation of the annual reports. Neither of the annual reports or board discussion recorded into the minutes reveals any review conversation of the Growth Policy by Board members or staff. I will be submitting a Public Request for Information for the 2015 and 2016 Annual Reports to the Planning Board and the Minutes of all Planning Board Hearings for the same years to determine if the growth policy has been reviewed at all since its adoption in 2014

### Proposed Actions:

1. Define what constitutes “changes in the legal framework” and advise the public.
2. Determine why a review of the Growth Policy has not been included in the Annual Planning Board Hearings as a necessary component of the growth policy’s implementation strategy.

3. Determine why the Cascade County Planning Board Bylaws do not specifically state the Boards "responsibility" for maintaining the Cascade County Growth Policy.  
For reference, please review the January 17, 2017 CC Planning Board Minutes discussion concerning extensive rewrite of the Bylaws. The minutes indicate considerable discussion of changes required by MCA changes, differentiating between the Board and the Commissioners, understanding Appointments, board member reimbursements for mileage, and the removal of Roberts Rules of Order and rules altogether to reduce public challenges to board decisions. Not a single comment was made about the Board's responsibility for Growth Policy review.
4. Utilizing the provisions in Article VIII Committees of the Cascade County Planning Board Bylaws create a standing committee to annually review the growth policy.
5. Create a specific and recurring growth policy review calendar, included in Chapter 9 Implementation Strategy, to establish consistent policy review periods and necessary budget/resource allocations.

Tammie Lynne Smith  
397 Highwood Road  
Great Falls, MT 59405



# Public Comment Form

Cascade County Public Works Department Planning Division  
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## Commenter Information

Name: Jáybe Floyd

Complete Address: 12 Homestake Ln Great Falls, MT 59405

## Comment Subject (please check one):

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 Growth Policy     
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  County Road Abandonment/ Discontinuation of County Street  
 Other (describe): \_\_\_\_\_

## Comment

I have reviewed the current Growth Policy. I think the information contained in it is out of date, and many recent issues of concern to citizens are not addressed in the current document. Since the County is supposed to use this document as a guide when decisions are made, it needs to be updated substantially. Citizen input should be invited and a new document produced that will provide meaningful guidance over the next 5 years.

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Date Received:	<u>5-13-19</u>	Date Reviewed:	<u>5-13-19</u>
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Members of the Cascade County Planning Board  
RE: Cascade County Growth Policy Public Comments  
May 13, 2019

Members:

Perusal of the extensive 81-page CC Growth Policy emphasizes the breadth and scope of the efforts of a vast number of professionals and stakeholders with highly diverse interests. Fundamentally, however, opening section 1.1 could not more clearly state an inherent requirement for the construction, adaptation and adoption of this important county tool.

**“Because growth policies have a significant impact on the ability to develop private land, a thorough public involvement process is critical to formulating these strategies. This growth policy’s designated growth areas are the result of time intensive public involvement efforts.”**

And from the introduction:

**“More extensive updates to the Growth Policy may require a possible re-write with additional public participation in the future.”**

The 2014 plan was written with extensive consultation with Malmstrom and with the assistance of professional consultants. Cascade County has an obligation to revisit a new or updated Growth Policy with the same regard to high standards that promote the varied interests of residents of both Great Falls and Cascade County.

As I stated in my spoken comments on April 16, 2019, process informs product. A less than comprehensive evaluation, formulation and adoption of a thoroughly updated policy with critical public input is not only undesirable, but in direct opposition to the stated goals and requirements of the process.

The introduction makes clear that funding for the 2014 study came from sources including the Federal Government.

**“In 2012 Cascade County, along with the other Malmstrom AFB Missile Complex Counties, completed a Joint Land Use Study (JLUS) which was funded in part by the Secretary of Defense’s Office of Economic Adjustment.”**

It is reasonable to expect a comparable standard for a new or revised document.

Thank you for your service to the public and for your attention to this important matter.

Sincerely,

Erin Tropila  
811 5<sup>th</sup> Ave N  
Great Falls, MT 59401



**From:** MICHAEL ENK <trouter@q.com>  
**Sent:** Monday, May 13, 2019 2:40 PM  
**To:** Planning Comments <planningcomments@cascadecountymt.gov>  
**Subject:** Comments: Cascade County Growth Policy

Your comment form does not work on my computer, so I'm submitting the following comments directly. My name and address are appended below.

It is timely and relevant that the Growth Policy be reviewed thoroughly. The Planning Board needs to provide much more opportunity for public comment at a sizable venue and an evening meeting that allows working people to participate.

Economic forces and market dynamics have changed significantly in the last five years, resulting in new challenges for family farms and ranches struggling to compete against multi-national mega-corporations seeking to dominate every aspect of US agriculture. There is much at stake for our rural landscapes and country lifestyles as these corporations attempt to convert our open spaces into industrial-scale production facilities. Our clean air, pure water and precious soils are all at risk from these factory farms, CAFOs and massive slaughter houses. THIS IS NOT THE KIND OF VALUE-ADDED AGRICULTURAL PRODUCTION THAT IS CONSISTENT WITH OUR FAMILY FARMS AND RANCHES, AND IT IS A SERIOUS RISK TO OUR RURAL MONTANA LIFESTYLE. The workforce that is required to operate industrial food production facilities would also create a huge burden on our urban areas in the form of housing needs, social services, schools and other infrastructure.

I am strongly opposed to allowing industrial farming operations and processing facilities in Cascade County. CAFOs and large slaughterhouses would bring pollution, heavy truck traffic and severe housing shortages to our doorsteps. Our Growth Policy needs to be strengthened to make quality of life and a clean environment our highest priorities. We can attract and grow new businesses that enhance our existing agricultural economy without threatening our clean air and water. We must preserve open space and protect the natural resources that sustain our outdoor recreation industry.

Michael Enk  
PO Box 1408  
6432 43rd St. SW  
Great Falls, MT 59403-1408

[trouter@q.com](mailto:trouter@q.com)

FOR OFFICE  
USE ONLY

Date Received: 5-13-19

Date Reviewed: 5-13-19

Complete:  Yes  No



# Public Comment Form

Cascade County Public Works Department Planning Division  
121 4th St N, Suite 2H-2I Great Falls, MT 59401  
Phone: 406-454-6905 | Fax: 406-454-6919  
Email: [planningcomments@casadecountymt.gov](mailto:planningcomments@casadecountymt.gov)

## Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form. Completed forms may be submitted in person at the Planning Division office or by email at [planningcomments@casadecountymt.gov](mailto:planningcomments@casadecountymt.gov).

## Commenter Information

Name: Claire Reichert Baiz  
Complete Address: 117 W Grove St. Apt. 204, Mishawaka IN 46545

## Comment Subject (please check one):

- Special Use Permit Application
- Subdivision
- Zoning Text and/or Map Amendment
- Growth Policy
- Variance
- Floodplain Regulation Amendment
- Subdivision Regulation Amendment
- County Road Abandonment/ Discontinuation of County Street
- Other (describe): \_\_\_\_\_

## Comment

Please see attached letter. Thank you.

### For Office Use Only

Date Received:	<u>5-13-19</u>	Date Reviewed:	<u>5-13-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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County Planning Division Office  
121 4th St. N.  
Great Falls, MT 59401

8 May 2019

Dear Planning Board,

I am grateful that the Planning Board is reviewing Cascade County's growth policy. We need to be sure the county's goals and objectives are aligned with a clear-headed vision of the future.

I am, however, uncertain about what comment is relevant at this point. There is obvious dissonance between the lengthy proposed changes in zoning regulations (eliminating agricultural zoning, for example) and the current growth policy. I am concerned that if a new growth policy is "efficiently implemented," if the public is not intimately involved in the formulation of a new policy, that it a new growth policy might advance the interest of a small, vested group of people who do not represent the best interests of the future of Cascade County.

I understand that, before proceeding with any changes to the zoning regulations, those in power need to determine whether revisions to the growth policy are necessary. Who exactly will determine whether a new growth policy is needed: the Planning Board, the County Commission, the GFDA? How will this determination be made, and who will be consulted? Will consultations and opinions regarding the necessity and potential direction of a new growth policy be public?

Have our priorities and perspectives changed in the last five years?

I believe they have. Extractive Industrial Agriculture, AKA "Big Ag" has big problems in the Midwest: they are running out of resources, and the patience (and health) of Midwesterners and their land is worn thin. Big Ag is hoping to accelerate agricultural extraction in Montana.

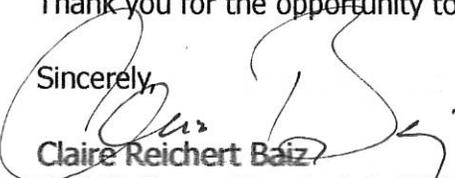
Big Ag cannot co-exist with real family farms; it eats them alive.

Judging from the strong interest in the proposed changes to zoning regulations, it makes sense for Cascade County to solicit as much input as possible, to offer multiple venues/pathways for citizens, businesses, and interested parties to have their say, and to try to forge consensus.

Should Cascade County decide that a new growth policy is needed, it is critical that the process be patient, transparent, accessible and that the resulting policy promotes a solid economic foundation and a healthy, sustainable lifestyle for this and future generations.

Thank you for the opportunity to express my concerns.

Sincerely,



Claire Reichert Baiz  
117 W Grove Street, Apt. 204  
Mishawaka IN 46544

May 6, 2019

County Planning Division Office  
121 4<sup>th</sup> St N  
Great Falls, MT 59401

Chairman Merja and members of the Board,

After listening to the comments of the last board meeting, I revisited the growth plan wondering if it was different than I recalled from 2014. It is not. I do not believe the over-arching goals set in 2014 have significantly changed. We have definitely not met our goals to grow.

A full review of the growth plan would need extensive research to gather the baseline statistics that are outdated and would then require extensive public comment and participation. It would not be right to only visit a few items that are currently generating controversy and have only the input of those that want to use the growth plan as a tool to prevent growth of which they do not approve. Because the growth policy has significant impact on the ability to develop private land, a thorough public involvement process is critical to formulating any changes.

I participated heavily in the JLUS, the 2014 Growth Plan and the last major re-write of Cascade County Zoning. A lot of staff time, outside consulting and public input went into their creation. Although they were never meant to be "forever" documents, we do need to give them adequate time to be implemented.

The primary goals listed were first identified in the 1982 Comprehensive Plan and again in 2006. In 2014, we felt that they were still applicable. There have been no major changes in Cascade County over the last five years that would lead one to believe that these have changed.

In Section 10 of the Growth Plan, we outline the basis for determining when revisions are necessary. There has been no major legal changes. There has been no major changes to existing trends or conditions. There is no reason to believe that the goals or objectives of our community have changed. There is no reason to believe that we cannot reach the goals outlined in the existing plan, nor have we met those growth goals. The county has not deviated from the policy.

That leaves two line items that possibly point to re-visiting the plan. First, the data is very outdated. However, we will not have accurate, updated data available until after the 2020 census. It would seem like a better use of staff time and taxpayer dollars to wait until after that data is available to undertake an updating of the baseline data in this document.

Second, the public request to review. As I attended the meeting, I also heard this request. However, a growth plan is not intended to be used to stop specific projects. It is not a regulatory document. Any attempt to do so could lead to a plan that is unworkable for all other development. I believe that by taking public comment on this issue and the board members taking the time to read thru the current

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Date Received: 5-13-19

Date Reviewed: 5-13-19

Complete:  Yes  No

growth plan, you have met your obligation under MCA 76-1-601 to review. There is simply no compelling reason to make changes at this time. Furthermore, waiting until after the 2020 census, when all government agencies update their numbers and goals, would be a much more prudent time to undertake this task.

Please, set this aside and move forward on the proposed zoning changes.

Sincerely,

*Ronda Wiggers*

**Ronda Wiggers Consulting**

474 U.S Hwy 89

Vaughn, MT 59487

Call: 406-899-5659

rondakwiggers@gmail.com

**From:** Mary S. <mary.sarumi@gmail.com>  
**Sent:** Sunday, May 12, 2019 6:45 AM  
**To:** Planning Comments <planningcomments@cascadecountymt.gov>  
**Subject:** Review of the current Growth Policy & public comments

May 12, 2019

Review of the current Growth Policy & public comments

I am writing and submitting my written public comment to advocate for more public participation and opportunity to reflect and make recommendations on possible revisions to the current Growth Policy.

We need a widespread and well-planned opportunity to submit public comments.

A milk processing plant and as multi species slaughterhouse will not lead to economic growth but will be a drain on the city. We must look on farther then what is happening in Wisconsin.

Dairy uses an extreme amount of water, a major cause of climate chaos. The dairy industry is declining in place of plant based options. This dairy and slaughterhouse would not be in the best interest of the city or state.

One Dairy Cow, 120 lbs. of waste per day.

Eishel, Gordon, et al. "Land, irrigation water, greenhouse gas, reactive nitrogen burdens of meat, eggs and dairy production in the United States". Proceedings of the National Academy of Sciences. Vol. 111 No. 33 June 2014

A dairy CAFO with 1000 animal units is equivalent to a city of 164,500 people. The important difference lies in the fact that human waste is treated before discharge into the environment, but animal waste is either not treated at all or minimally treated by virtue of the storage methods used before disposal."

<http://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=901V0100.txt>

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Hyner, Christopher. "A Leading Cause of Everything: One Industry That Is Destroying Our Planet and Our Ability to Thrive on It". Georgetown Environmental Law Review. October 23, 2015.

"How Bad of a Greenhouse Gas is Methane? The global warming potential of the gaseous fossil fuel may be consistently underestimated". Scientific American. December 22, 2015.

Methane has a global warming potential 86 times that of CO2 on a 20 year time frame.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Mary Sarumi  
1417 10<sup>th</sup> Av NW  
Great Falls, Montana 59404



Date Received: 5-12-19  
Date Reviewed: 5-13-19  
Complete:  Yes  No



615 THIRD AVENUE NORTH  
GREAT FALLS, MONTANA  
59401

May 10, 2019

Cascade County Planning Department (via email)  
325 2<sup>nd</sup> Ave N  
Great Falls, MT 59401

*Missouri River Citizens  
(MRC), a non-profit MT  
Corporation, organized to  
promote green belt- open space  
and wise land use along the  
Missouri River*

**RE: MRC Requests Major Revisions to Cascade County Current Growth Policy Plan**

Dear Cascade County Planning Department:

**We write to Request Major Revisions to Cascade County Current Growth Policy Plan.**

**MISSOURI RIVER CITIZENS, INC. (MRC) MISSION STATEMENT:**

We are a citizens' action group. We keep watch over (monitor) Missouri River activities pertaining to stream flow; vegetation; natural and riparian areas; wildlife and aquatic life; water quality and pollution (discharge and non-point); recreation; subdivision; commercial, industrial, domestic uses; transportation systems; brownfields; and trails; on lands bordering the Missouri River, particularly in Cascade County.

Our mission is to increase public awareness of issues germane to the protection and use of the Missouri River as a living river, past, present, and future. We wish to ensure that future generations (as well as those presently living) will have a living Missouri River that protects fisheries, water quality, the drinking water supply, flows, and wildlife, while still promoting economic activity in the Missouri River Basin.

In addition, we want the residents of Great Falls to enjoy and participate in our river corridor (not just drive by). The Rivers Edge Trail and the Tenth Street Bridge provide opportunities for solitude and exercise on the banks of the Missouri and, in the case of the historic Tenth Street Bridge, over it, without having to fight the ubiquitous automobiles for space and quiet.

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Date Received: 5-10-19  
Date Reviewed: 5-10-19  
Complete:  Yes  No

Cascade County Planning Department  
RE: Request Major Revisions to Cascade County Current Growth Policy Plan  
May 10, 2019  
Page 2 of 4

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We believe that urban trails are as important as wilderness trails, and may be more important in that they allow urban dwellers to enjoy the natural beauty of Big Sky Country without having to travel long distances by car to get there.

The Missouri River/Sun River system here in Great Falls is a natural wonder to be enjoyed by all.

#### FAILURE OF THE CURRENT CASCADE COUNTY GROWTH POLICY PLAN

Even though the County agreed to develop a countywide Missouri River Corridor Plan via the Missouri River City-County corridor plan adopted in 2004, that goal was omitted in the County Growth Policy Plan adopted May 27, 2014. Furthermore, the new Growth Policy Plan failed even to mention the value of protecting our rivers as part of the section entitled: “the economic, recreational and environmental well being of all.” However, presumably Objectives D and F in Goal 2 (page 2-2 of the 2014 Growth Policy Plan) could be construed to cover Missouri Corridor issues:

D. Assure clean air, clean water, a healthful environment and good community appearance.

....

F. Continue to work with federal and state agencies to redevelop properties within Cascade County which are currently undergoing Superfund and Brownfields processes.

These two objectives are under Goal 2 of the 2014 Growth Policy Plan, which is to “Protect and maintain Cascade County’s rural character and *the community’s historic relationship with natural resource development.*” (Emphasis added). It is clear that the last clause of this Goal 2 must be revised to properly protect the River. If “natural resource development” continues to be our goal, without regard to protecting the quality of the Missouri River’s water, we will end up with more Superfund sites.

As it stands, the 2014 Growth Policy Plan is a great disappointment.

#### THE CASCADE COUNTY PLANNING DEPARTMENT’S PROCESS IS FLAWED IF THE CURRENT GROWTH POLICY PLAN IS NOT CAREFULLY REVIEWED AND REVISED

Montana Code Annotated (MCA) 76-1-601 (3)(f) requires the Cascade County Planning Board to review the Cascade County Growth Policy at least once every five (5) years after adoption. The current Growth Policy was adopted in 2014. It outlines the vision and goals that become the foundation of the Zoning and Subdivision ordinances adopted by the County government. See [http://www.cascadecountymt.gov/df/361/Adopted2014\\_GrowthPolicy.pdf](http://www.cascadecountymt.gov/df/361/Adopted2014_GrowthPolicy.pdf)

*Cascade County Planning Department  
RE: Request Major Revisions to Cascade County Current Growth Policy Plan  
May 10, 2019  
Page 3 of 4*

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MRC agrees with the comments of Montanans for Responsible Land Use (MFRLU) and believes the Cascade County Government should complete their 5-year review of the Cascade County Growth Policy Plan and recommends major revisions to the plan as follows:

FIRST: During this review MRC urges that Missouri River Corridor issues, goals, and planning processes as set forth in the Missouri River Corridor Plan (MRCP) should be made a part of a new Cascade County Growth Policy Plan. (The following is the link to the City's web site where the MRCP can be found <<https://greatfallsmt.net/planning/comprehensive-planning>>

Attached are a portion of pages 8 and 9 of the MRCP with language highlighted in yellow of language we recommend be added to a revised growth policy plan.

SECOND: The City and the County should commit themselves to the vision promulgated in the MRCP, including having Cascade County develop a countywide Missouri River corridor plan.

THIRD: We recommend the County search for funding to develop a countywide Missouri River Corridor Plan. Professionals should be hired to develop a plan with the help of a group of diverse rural stakeholders which can be presented to the County (and the City) for approval and once approved This plan should be added to a revised Cascade County growth Policy Plan.

FOURTH: The City and County should have as a goal in the new Growth Policy Plan the re-establish a joint City-County Planning Department covering the city and the County area around the city covering an area at least as large as the prior city-County planning department. This new joint planning department when it is set up should address the issues of control which concerned Commissioner Briggs so that we can have a joint planning department which is under the control of both City and County Commissioners and a set of planning goals both the city and the County agree upon and a method for revising these goals with both city and County agreement. We think this would save both the city and County \$\$ and allow for smarter growth.

FINAL THOUGHTS: In conclusion our Current Growth Policy Plan by not considering the Missouri River's ecological and economic needs pursues a dangerous path that could easily result in catastrophic results for the quality of life in our county. The failure of Cascade County's 2014 Growth Policy Plan can easily be seen where the County participated with the city in promoting the expansion of the refinery or the new industrial park adjacent to giant Springs rather than the North Industrial Park. The refinery itself is a Superfund site, and now it is expanding, right on the edge of the River in the middle of center of our population. Industrial expansion above giant springs takes a world class natural area that both the state and federal government sought to preserve and degrades it!

There is nothing more important to human survival in today's world than clean water! Here in Cascade County we are blessed with this wonderful Missouri River. It is our most important and

Cascade County Planning Department

RE: Request Major Revisions to Cascade County Current Growth Policy Plan

May 10, 2019

Page 4 of 4

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defining asset. How can we risk the River by permitting continued potential Superfund sites to be developed in the Missouri River Corridor?

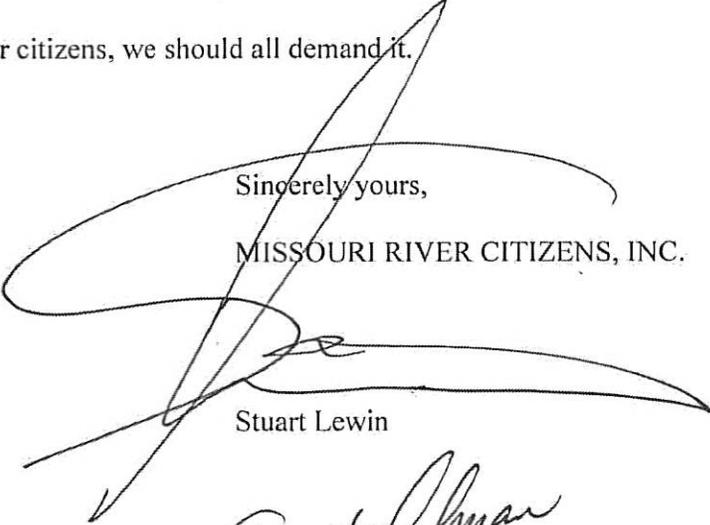
What do you suppose the citizens of Fort Benton would think about what we are doing here in Cascade County? Their drinking water comes out of the Missouri. For that matter, what does the City of Great Falls and Cascade County think? We also take our drinking water out of the Missouri. As the River becomes more polluted through Cascade County's shortsighted growth policy plan, we all suffer, we and our neighbors. We all live downstream!

We can and should do much better. Let's amend the 2014 Growth Policy Plan to provide strategies to improve our care for our rivers. Then we can propose zoning law changes and administrative changes that will best provide for our future.

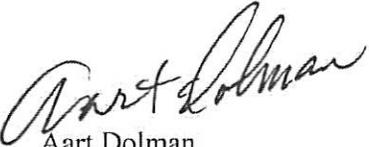
As Missouri River citizens, we should all demand it.

Sincerely yours,

MISSOURI RIVER CITIZENS, INC.



Stuart Lewin



Aart Dolman



Hilary Ransdell-Lewin  
Members of the Board of Directors

# RURAL AREAS

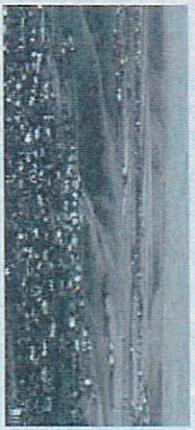
While this plan addresses the urban corridor of the river, of equal importance are the vast rural reaches of the Missouri River in unincorporated Cascade County. In these rural areas there are multiple examples of unauthorized placement of fill material and other stream-bank stabilization projects which have adversely affected river dynamics and environmental functions.

Cascade County conducts floodplain management and permitting under the National Flood Insurance Program. Although Cascade County does not have a standard building setback requirement in the rural areas, the county subdivision regulations and the Cascade County Development Plan both address construction in floodplains. The subdivision regulations provide that land located in the floodplain of a 100-year frequency event as defined by Title 76, Chapter 5, MCA, or land deemed subject to flooding as determined by the governing body, shall not be subdivided for building or residential purposes or other uses that may increase or aggravate flood hazards to life, health, or property.



from floods; financial burdens imposed upon the County through rescue and

associated with flood conditions; potential loss of location, character, and extent of natural drainage courses; to regulate and prohibit any non-agricultural or non-recreational uses, structures or activities. Therefore, in the bottomlands occupying watercourse valleys,



which are comprised of soils containing alluvial material, developers are required to use existing official floodplain delineations, or, cause to have floodplain lines engineered independently. Any development of non-agricultural or non-recreational uses will not be allowed to take place within these floodplain delineations.

Many existing riverfront lots in rural Cascade County were created either through the subdivision exemption process or were not subject to review by the County when State law exempted lots greater than 20 acres in size from local review. This has resulted in homes and other structures that, while in compliance with floodplain regulations,

destroyed riparian areas and have encroached into pristine river viewsheds.

As part of this planning effort, a sub-group of the Corridor Plan Work Group began preliminary work on a program and regulatory framework for the rural areas. Of particular importance are the continued use of riprap and other stream-bank stabilization techniques and the removal of natural vegetation. This effort will continue and expand after adoption of this plan to include a larger group of stakeholders and citizens representative of rural interests. That work should result in a document and regulatory program that can be forwarded to and adopted by Cascade County as a complementary component of this plan.

## GUIDING PRINCIPLES



This Corridor Plan has multiple objectives. It seeks to communicate a vision for economic vitality, for development and redevelopment of lands within the Missouri River Corridor for the benefit of the entire community. At the same time it recognizes that the river is a vital part of a large ecosystem, and that the environmental integrity of the river must be protected. To better frame the issues to be addressed in this document, it is helpful to set forth the basic premises, or "guiding principles", on which the plan is based. These principles can then be used as a yardstick with which to measure all actions and recommendations contained in the plan.

1. From the standpoint of river dynamics, no riverside development or stream bank treatment will prevent the Missouri River from safely passing flood stage flows, nor will permanent development be allowed that will be damaged by those flows. (Note: This statement is not intended to prevent the placement of properly designed and lawfully constructed piers, decks,

substantial public interest that may in fact be damaged by major flood events).

2. Land and water based recreational values and opportunities associated with the river will be created, preserved, and enhanced, including public access to the river.

3. This Corridor Plan will promote beneficial, sustainable economic development that utilizes the river as an amenity while preserving and enhancing its ecological integrity and asset values. Specifically, water quality, natural shoreline vegetation, and wetlands will be restored, enhanced, or protected, and the environmental health of the river will not be compromised by development.

4. Major through transportation facilities in the river corridor are discouraged. Alternative routing of such facilities already in the corridor through responsible urban area transportation planning is encouraged.

9



## Public Comment Form

Cascade County Public Works Department Planning Division  
 121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
 Phone: 406-454-6905 | Fax: 406-454-6919  
 Email: [planningcomments@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov)

### Instructions

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### Commenter Information

Name: Terry Thompson

Complete Address: 317 34th Avenue NE, Great Falls, MT 59404

### Comment Subject (please check one):

- Special Use Permit Application     
  Subdivision     
  Zoning Text and/or Map Amendment  
 Growth Policy     
  Variance     
  Floodplain Regulation Amendment  
 Subdivision Regulation Amendment     
  County Road Abandonment/ Discontinuation of County Street  
 Other (describe): \_\_\_\_\_

### Comment

While MCA 76-1-601 requires the growth policy to include a timetable for review every 5 years, it also allows the local planning board to determine if updates are necessary. When including this review process in the Growth Policy, Section 10 also outlined reasons that would determine a need for updating the policy. I understand that a small number of citizens have suggested the need for changes, but I do not believe the remaining criteria has been met.

With "Population" being a key element of the policy, it makes sense to wait until after the 2020 Census has been completed before updating the Growth Policy. Using outdated population data doesn't make sense and won't represent an accurate picture in conjunction with other elements of the policy. The current policy used four-year old population data. Let's take advantage of the opportunity to have a more accurate representation of the County's population.

Also, nothing substantial has happened in the County that warrants prematurely updating the Growth Policy prior to having the 2020 Census completed.

For these reasons I am against the Growth Policy being changed at this time.

Thank you for the opportunity to comment.

For Office Use Only			
Date Received:	<u>5-9-19</u>	Date Reviewed:	<u>5-9-19</u>
Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	



# Public Comment Form

Cascade County Public Works Department Planning Division  
 121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
 Phone: 406-454-6905 | Fax: 406-454-6919  
 Email: [planningcomments@casadecountymt.gov](mailto:planningcomments@casadecountymt.gov)

## Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form. Completed forms may be submitted in person at the Planning Division office or by email at [planningcomments@casadecountymt.gov](mailto:planningcomments@casadecountymt.gov).

## Commenter Information

Name: TAMMIE LYNNE SMITH

Complete Address: 397 HIGHWOOD ROAD, GREAT FALLS, MT 59405

## Comment Subject (please check one):

- Special Use Permit Application       Subdivision       Zoning Text and/or Map Amendment  
 Growth Policy       Variance       Floodplain Regulation Amendment  
 Subdivision Regulation Amendment       County Road Abandonment/ Discontinuation of County Street  
 Other (describe): CAROLYN CRAVEN PUBLIC COMMENT 05/07/2019

## Comment

TO: PLANNING STAFF, PLANNING BOARD, COUNTY ATTORNEY

As allowed for by Carey Ann Haight in correspondence dated Friday, March 22, 2019, in which she states "Members of the public who have the same message to share, such as a "me too" comment, really only need to briefly state that." Further, "The "me too" comment weights just as much in terms of public comment as the original speaker who elaborated at length on the particulars."

I have reviewed Carolyn Craven's Public Comments submitted on May 07, 2019 and agree with the discussion concerning appropriate and productive public participation in any review concerning the "need for revisions" to the current Growth Policy. In addition, I fully support utilizing multiple resources including collaboration with other counties and jurisdictional areas to find new and progressive solutions to Montana's long term economic growth and development. The cities of Great Falls, Billings, Helena, and Missoula have taken on the challenge of updating Growth Policies to meet the fast paced changes and needs of their communities. Cascade County cannot risk falling behind or becoming so deficient in it's plan for the future that it becomes permanently obsolete.

MCA 76-1-601(2)(f)(ii) requires the local government to review the growth policy a least once every five years and revise the policy as necessary. During this review the community should determine if the existing goals and objectives are still appropriate or if they need to be updated. Cascade County's Growth Policy has not been annually reviewed during the Planning Board Annual Meeting (see page 9-1) and 2019 marks year five since it's adoption.

SEE ATTACHED

### For Office Use Only

Date Received:	<u>5-9-19</u>	Date Reviewed:	<u>5-9-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

May 7, 2019

## **PUBLIC COMMENTS ON CASCADE COUNTY GROWTH POLICY**

### **RATIONALE FOR PUBLIC PARTICIPATION IN 2014 GROWTH POLICY REVISIONS**

#### **I respectfully submit that the 2014 Growth Policy is due for revisions with public input.**

The 2014 version only added “recommendations regarding updating the Growth Policy to incorporate language related to potential conflicts between development and the military mission. Those changes were incorporated along with several minor updates in 2013. Following the public comment period, Cascade County adopted the changes recommended.” The authors also stated that “*More extensive updates to the Growth Policy may require a possible re-write with additional public participation in the future.*”

There have not been any major revisions since the 2006 Growth Policy. However, we are collectively experiencing significant changes both locally and globally. We are faced with the uncertainties of climate change, including challenges globally with droughts and floods. We are unsure of the long-term sustainability of the Madison Aquifer. Our education system is currently below average and our students have fewer opportunities to learn technology and the required skills to gain employment in that growing sector. We have positive changes in healthcare, with medical marijuana providers being recognized in the medical community. Public comments have reinforced changes in community goals and concerns about the direction we are currently headed in the county.

The 2014 Growth Policy states the basis for determining whether to revise the Growth Policy will include an assessment of “Significant changes in existing or projected trends, Changes in the circumstances upon which the goals and objectives are based, Changes in community goals, Knowledge of specific and identifiable amendments that would improve the Growth Policy’s usefulness, and Public input suggesting the need to make changes (5/9 items).

**Please see items below on Montana cities and counties updating and revising their Growth Policies. Included are the City of Great Falls 2013, Billings 2016, Helena 2019, Missoula County 2016, Lake County 2017 and Phillips County 2018. They have included well-planned public comments via conversations in various venues over an extended period of time, including hiring a consultant, public meetings, online questionnaires, Facebook, working groups for key players (i.e. fire, police, transportation, housing), opportunities for citizens to sign up for working groups, community presentations, presentations to social and professional groups, SWOT analysis (strengths, weaknesses, opportunities, threats), an up-to-date County Growth Policy website for continual information and results from the working groups, plus press releases to the media.**

C.K. Craven  
Homeowner

### CASCADE COUNTY GROWTH POLICY 2014

The Cascade County Development Plan was approved in 1979 with subsequent revisions. The new Growth Policy was adopted in 2006 with a subsequent update with minor revisions adopted in 2014. In the 2014 Growth Policy the authors stated that the next revision with “more extensive updates to the Growth Policy **may require a rewrite with additional public participation**” (p12).

“The Cascade County Growth Policy serves as a comprehensive plan to provide guidance on decisions regarding land development and public investments.....Because growth policies have a significant impact on the ability to develop private land, a **thorough public involvement process is critical** to formulating these strategies. This growth policy’s designated growth areas are the result of **time intensive public involvement efforts**. **The Cascade County Growth Policy is a living document that is reviewed and updated periodically in order to address changes within the community that may alter the considerations for land development and public investment.** (p10)

### CITY OF GREAT FALLS 2013 REVISION OF GROWTH POLICY - CITY-WIDE SURVEY

“To launch the public participation phase for Imagine Great Falls, the City offered a 25-question **survey to ascertain public opinion on a number of potential plan objectives**. The survey was made available at the initial **Open House, as part of over 40 presentations and also on-line on the City’s website**. **Responses from 625 people** were received. These responses, combined with the input derived from presentation exercises, the **Open House** and the **working group reports**, helped to form for the development of the Imagine Great Falls project.”

### CITY OF BILLINGS GROWTH POLICY UPDATE 2016

“Since the last update to the City and County Growth Policy in 2008, the City of Billings has added more than 6,000 people and has expanded by 1.5 square miles.....Growth alone has public costs associated with it but the needs and **preferences of the public may also increase costs as values and priorities change**. **One of the main purposes of this Growth Policy is to determine current public values and priorities**. A second purpose is to compare patterns of growth to examine if there are more cost-effective ways to develop. The approach to this Growth Policy and the methods used were tailored to address the two main purposes. **Through an extensive public comment process and carefully modeled growth scenario planning**, a vision for Billings in the next 20 years emerged. This vision is embodied in the Growth Policy Statement...Most importantly, **the citizens of Billings who provided comments and attended the public meetings need to be recognized**. Thanks to everyone for the support and direction given during this process...The **public comments were also the basis** for three other important elements of this Policy: objectives, toolboxes, and performance measurements.”

### CITY OF HELENA GROWTH POLICY UPDATE 2019

“The City of Helena, in its efforts **to provide a more inclusive, dynamic and vibrant community**, has chosen to undertake certain long-range planning activities including a Growth Policy update. This guiding document provides a road map for the management of growth within and adjacent to the city limits. The City hopes that this along with other adopted documents can provide residents, staff, and investors with the tools they need to better understand the city and how to best navigate the development process. A Growth Policy in Montana must address certain criteria as set forth in the Montana Code Annotated. Among the criteria are topics such as housing needs, economic conditions, local services and public facilities. **We have hired a consultant**, SCJ Alliance, to assist with the development of the city’s Growth Policy. **We would like for you to be involved in the process by submitting a comment, attending public meetings, or scheduling a meeting with staff to discuss your ideas.**”

C.K. Craven  
Homeowner

**MISSOULA COUNTY GROWTH POLICY 2016**

*Missoula adopted a Growth Policy in 2006 and made minor revisions in 2014. At that time a process was initiated to review and update, continuing until 2016. The process included **three full rounds of public outreach and engagement, plus review of goals, objectives and other elements of the Growth Policy with corresponding public hearings.** The review determined revisions were warranted **“based on changes in community goals that would improve the Growth Policy’s usefulness so that it better serves the public”.***

**PHILLIPS COUNTY GROWTH POLICY 2017**

*This is an update and revision of the 2006 Growth Policy.*

*“Public involvement will continue to mandate attention to processes and revisions of land use and similar plans for the administration of public lands, wildlife and their impacts within Phillips County.” GOAL: Maintain land use and development in Phillips County that balances the many needs and interests **which will not remove agriculture and grazing lands from production** while maintaining our rural quality of life for the County’s current and future generations.*

**LAKE COUNTY GROWTH POLICY UPDATE 2018**

*The initial Growth Policy was adopted in 2003 with updates in 2005. This 2018 revised Growth Policy reflects significant public input, as per this acknowledgement:*

*“Thank you to all participants! **A special thanks to all of the dedicated residents of Lake County who contributed to this growth policy in their free time by participating in public meetings, submitting comments, filling out surveys and questionnaires, answering our questions, and giving information and photos. Your time, efforts and ideas are very much appreciated and reflected in this plan. We would also like to thank local newspapers and radio stations who published articles and interviews on the growth policy rewrite and kept the public informed.**”*

**A Growth Policy is:**

A community **vision** for how it sees its **future**

A community **vision** for **how** and **where it wants to grow**

**An official statement of public policy** to guide growth and change

**A dynamic document** that changes with the community

It has been shown that local officials are well aware that formal public hearings are sometimes a very ineffective means of getting people involved or encouraging meaningful dialogue or discussion.

## RECOMMENDATIONS FOR PUBLIC PARTICIPATION

- 1) Focus Groups
  - Possible Categories
    - Environment
      - Land – Air – Energy
    - Water
    - Missouri River Corridor
    - Economic
    - Technology & Education
    - Community Health
    - Housing
    - Transportation
    - Cultural
    - Tourism
    - Land Use
    - Public Services & Facilities
    - City-County Interface
    - Public Input
- 2) Outreach via social media/Facebook, television, regular updates in printed and online newspapers (including The Electric and Montana Today)
- 3) Create and provide easy access to Cascade County Growth Policy Revisions 2019 website for residents to read and add suggestions and comments
- 4) Provide email/text notifications of meetings, presentations and updates
- 5) Online poll on preserving Agricultural zoning/add/delete definitions, etc.
- 6) Online poll for expanded clarity of categorizing Agricultural-Crop Production and Agricultural-Animal Production, as the impacts of each are vastly different
- 7) Town hall meetings in the incorporated communities in Cascade County
  - Great Falls, Cascade, Belt, Niehart

#### LEGAL CITATIONS

- 2017 MCA 76-1-601(2) requires the local government to review the growth policy at least once every 5 years and revise the policy, as necessary.
- 2017 MCA 76-1-601(3) A growth policy must include: a) **community goals and objectives**.
- 2017 MCA 76-1-601 (3) A growth policy must include: (g) a statement of how the governing bodies will coordinate and cooperate with other jurisdictions that explains: (ii) if a governing body is a county, how the governing body will coordinate and cooperate with cities and towns located within the county's boundaries on matters related to the growth policy.
- Public participation is not only required under statute, but **local governments must encourage participation by developing local procedures for such purposes**.  
2017 MCA 2-3-103, states that "Each agency shall develop procedures for permitting and encouraging the public to participate in agency decisions that are of significant interest to the public. The procedures must ensure adequate notice and assist public participation before a final agency action is taken that is of significant interest to the public."  
*From MT Planning Board Members Handbook 2009*
- One of the most important phases of the development of a growth policy is the articulation of **community goals and objectives**. The development of goals and objectives provides the philosophical framework for the growth policy.  
*From MT Growth Policy Resource Book 2009 (p18)*

Article 2 Section 3 of the MT Constitution guarantees Inalienable Rights. "All persons are born free and have certain inalienable rights. **They include the right to a clean and healthful environment** and the rights of pursuing life's basic necessities, enjoying and defending their lives and liberties, acquiring, possessing and protecting property, and seeking their safety, health and happiness in all lawful ways. In enjoying these rights, all persons recognize corresponding responsibilities.

**Because zoning must correlate to the Growth Policy, it is important to address additional goals in revising the Growth Policy, including an emphasis on environmental quality, and to ensure that the collective community is creating a vision we can agree on for the future of our county. The vision created through the Growth Policy is the basis for the types of zoning regulations we need to create.**

**There should be no reason to be in a hurry, but rather to invest wisely in taking the time to make thoughtful decisions.**

## ADDITIONAL INFORMATION

One of the most important phases of a growth policy is the articulation of community goals and objectives for our county. A “community visioning process” is one of the processes through which our county imagines the future it most desires and then plans to achieve those goals. Broad public participation is crucial to assure the success in this revision process. Public participation in local decisions is fundamental to our democratic process of development.

*MT Growth Policy Resource Book 2009*

Growth policies that reflect the vision of a community through citizen participation and that comply with Montana’s statutory requirements will generally withstand most legal challenges. The Montana Environmental Quality Council report, *Planning for Growth in Montana*, identified several benefits of community planning, including the following:

- *Makes communities safer and healthier by encouraging well-designed streets, protecting water quality, and deterring development in unsuitable areas such as floodplains, wetlands, fault zones, and unstable slopes.*
- *Protects special community values, such as historic, cultural, scenic and natural features, or rural agricultural character.*
- *Builds public consensus and greater understanding of issues within the community.*
- *Maintains property values for residential, commercial, and industrial properties by preventing nearby incompatible or degrading uses.*

Good public participation can highlight concerns and issues not always apparent to the local planners or officials. It can provide a voice for diverse interests and helps a community “buy into” the reasons for a growth policy or revision. If the public has been part of the process then they will have “ownership” of the final document. An additional benefit of public participation is that when properly documented, it gives significant legal support to the growth policy when it is officially adopted by local government.

There are many methods that can be used to encourage public participation. Informal neighborhood and town meetings, citizen surveys and questionnaires, media coverage, open houses, distribution of printed materials, presentations to civic groups, and public hearings are just a few options. The Montana Department of Commerce, Community Development Block Grant (CDBG) Program, has published a booklet entitled *The Community Needs Assessment Process*, which describes several different methods for encouraging public involvement and obtaining public input. This publication also includes examples of some of the creative ways in which Montana communities have involved the public in the process of identifying community needs and goals and objectives. *(From website: <http://comdev.mt.gov/>)*

**I RESPECTFULLY REQUEST THAT THE PLANNING BOARD RECOMMEND A WELL-PLANNED REVISION OF THE GROWTH POLICY WITH ADEQUATE TIME TO HAVE PUBLIC MEETINGS AT LATER TIMES TO ENGAGE MORE OF THE PUBLIC AND TO RECOMMEND THOUGHTFUL CHANGES.**

Respectfully submitted,



Carolyn K. Craven  
C.K. Craven  
Homeowner



# Public Comment Form

Cascade County Public Works Department Planning Division  
 121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
 Phone: 406-454-6905 | Fax: 406-454-6919  
 Email: [planningcomments@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov)

## Instructions

This form is for providing public comment to the Cascade County Planning Division for review by any one or more of the following review and/or approval boards: Zoning Board of Adjustment (ZBOA), Planning Board, or Board of County Commissioners. Only complete submissions will be included for board review. Please provide the relevant information for each section below. A complete submission provides all of the following: commenter name and address, comment subject, and commentary on the subject issue(s). If additional space is needed for commentary, please attach additional sheets to this form. Completed forms may be submitted in person at the Planning Division office or by email at [planningcomments@cascadecountymt.gov](mailto:planningcomments@cascadecountymt.gov).

## Commenter Information

Name: TAMMIE LYNNE SMITH

Complete Address: 397 HIGHWOOD ROAD, GREAT FALLS, MT 59405

## Comment Subject (please check one):

- Special Use Permit Application     
  Subdivision     
  Zoning Text and/or Map Amendment  
 Growth Policy     
  Variance     
  Floodplain Regulation Amendment  
 Subdivision Regulation Amendment     
  County Road Abandonment/ Discontinuation of County Street  
 Other (describe): CAROLYN CRAVEN PUBLIC COMMENT 04/30/2019

## Comment

TO: PLANNING STAFF, PLANNING BOARD, COUNTY ATTORNEY

As allowed for by Carey Ann Haight in correspondence dated Friday, March 22, 2019, in which she states "Members of the public who have the same message to share, such as a "me too" comment, really only need to briefly state that." Further, "The "me too" comment weights just as much in terms of public comment as the original speaker who elaborated at length on the particulars."

I have reviewed Carolyn Craven's Public Comments submitted on April 30, 2019 and concur that a discussion concerning Climate Change, based on the best science to date, is necessary in the five year review of the CC Growth Policy. Considerations concerning climate change are being made at the federal and state level. It is an unavoidable discssion that should be addressed sooner rather than later.

MCA 76-1-601(2)(f)(ii) requires the local government to review the growth policy at least once every five years and revise the policy as necessary. It is during this review that the community should determine if the existing goals and objectives are still appropriate or if they need to be updated. Cascade County's Growth Policy has not been annually reviewed during the Planning Board Annual Meeting (see page 9-1) and 2019 marks year five since it's adoption.

There are many tools available to assist local governments. The American Planning Association Policy Guide includes helpful steps to forming a framework for climate change.  
SEE ATTACHED

### For Office Use Only

Date Received:	<u>5-9 -19</u>	Date Reviewed:	<u>5-9 -19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

April 30, 2019

## PUBLIC COMMENTS ON CASCADE COUNTY GROWTH POLICY

### RATIONALE TO UPDATE 2014 GROWTH POLICY

#### 1) CLIMATE CHANGE

“The growing climate crisis and the emerging policies to address it make it essential for planners to respond to climate change issues now.

Policy action on climate change is happening across the nation.”

*From American Planning Association Policy Guide on Climate Change*

Four ideas form a framework for this guide...

- First, the policy responses to climate change need to be based on the best possible science. Because climate change is bringing about previously unrecorded conditions, projections based on new scientific modeling are the best way to anticipate and respond. Planners must have access to vital data, information and resources to help them interpret these unprecedented changes
- Second, the specific impacts of climate change are highly regional and even local in nature. Therefore, climate change policies cannot be based on a one-size-fits-all approach. Planners must be aware of what the future holds for their particular geographic region and formulate their strategies accordingly. While plans and policies must reflect the individual needs of local areas, any successful mitigation effort will require a national, and indeed international, framework for addressing GHG emission.
- Third, adapting to climate change is just as important as mitigating it. Planners can have a significant effect on climate change mitigation through a variety of actions, including encouraging higher density development, reducing vehicle-miles-traveled (VMT), using green building techniques, and supporting alternative energy sources. However, due to the extent of potential impacts projected under even the most aggressive mitigation scenarios, planners will also need to address the effects of climate change including rising sea levels, greater drought conditions and flood control in planning for adaptation.
- Finally, planners need to communicate about climate change in new and different ways. Policies that we develop now will have a long-range timeframe. Given that it is often hard to keep people engaged over even the short-term, planners will need new communication tools to explain climate change issues and maintain the focus on long-term adaptation and mitigation responses. Citizen participation and engagement is vital to the success of climate change efforts.

**Link to complete APA Policy Guide on Planning and Climate Change**

[https://planning-org-uploaded-media.s3.amazonaws.com/legacy\\_resources/policy/guides/pdf/climatechange.pdf](https://planning-org-uploaded-media.s3.amazonaws.com/legacy_resources/policy/guides/pdf/climatechange.pdf)

**Link to APA Sustainable Policy Framework**

<https://planning-org-uploaded-media.s3.amazonaws.com/document/Sustainability-Policy-Framework.pdf>

C.K. Craven  
Homeowner

## 2) MCA CODE ANNOTATED REQUIREMENT TO REVIEW GROWTH POLICY AND OPPORTUNITY TO REVISE CURRENT GROWTH POLICY

- MCA sections 76-1-601(2)(f)(ii), requires the local government to review the growth policy at least once every 5 years and revise the policy, as necessary. It is during this review that the community should determine if the existing goals and objectives are still appropriate or if they need to be update". (p21) *From MT Code Annotated 76-1-601*

Legally, there is not a requirement to update the Growth Policy every five years, only to review it and revise as necessary. However, there is an ethical requirement to invite the citizens of Cascade County to participate in a revision of the Growth Policy consistent with the unpredictable environmental changes happening on our planet and unexpected massive proposed zoning changes.

## 3) 2014 GROWTH POLICY

- "At least once every five years after adoption, the Cascade County Planning Board will review the Cascade County Growth Policy to determine if revisions are necessary, as required by 76-1-601 (3)(f) MCA. The basis for such determination whether to revise the Cascade County Growth Policy will include an assessment of the following issues" (p76).  
(Total of nine issues with five discussed below)
  - ☐ Significant changes in existing trends and conditions or projected trends.
    - Having proposed zoning changes eliminating Agriculture zoning is a significant change and has generated numerous public comments. Projected trends include the uncertainties of climate change and the uncertainties of how sustainable the Madison Aquifer is.
  - ☐ Changes in the circumstances upon which the goals and objectives are based.
    - The proposed zoning changes allowing large scale industrialized animal production is a significant change in direction and mandates a thoughtful and thorough dialogue about the kind of future citizens of Cascade County want.
  - ☐ Changes in community goals.
    - The citizens of Cascade County have not had an opportunity to formulate a vision for the net five years, which likely will involve changes. Public input has been provided opposing the significant proposed zoning changes.
  - ☐ Public input suggesting the need to make changes.
    - There has been significant public input regarding maintaining agricultural zoning and opposing the proposed zoning changes, including opposing industrialized animal production, as well as maintaining our open spaces, clean water and air.
  - ☐ Knowledge of specific and identifiable amendments that would improve the Cascade County's Growth Policy's usefulness, so that it better serves the public.
    - Recommended amendments are in process for this public comment period.

**4) OPPORTUNITY TO CREATE A VISION FOR SUSTAINABLE ENVIRONMENTAL HEALTH,  
ECONOMIC GROWTH AND TOURISM**

- Allowing well-planned diverse venues for community dialogue over a period of time appropriate to allow meaningful public input will facilitate a new vision for the next five years. This is our home and we, the public, have a legal and ethical right to participate in the decisions of our elected and appointed government officials in whom we have entrusted the highest well-being of our land, air, water, public health and the social fabric of our communities.

Respectfully submitted,



Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

C.K. Craven  
Homeowner



## Public Comment Form

Cascade County Public Works Department Planning Division  
 121 4<sup>th</sup> St N, Suite 2H-2I Great Falls, MT 59401  
 Phone: 406-454-6905 | Fax: 406-454-6919  
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### Commenter Information

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 Growth Policy       Variance       Floodplain Regulation Amendment  
 Subdivision Regulation Amendment       County Road Abandonment/ Discontinuation of County Street  
 Other (describe): CAROLYN CRAVEN PUBLIC COMMENT 04/15/2019

### Comment

TO: PLANNING STAFF, PLANNING BOARD, COUNTY ATTORNEY

As allowed for by Carey Ann Haight in correspondence dated Friday, March 22, 2019, in which she states "Members of the public who have the same message to share, such as a "me too" comment, really only need to briefly state that." Further, "The "me too" comment weights just as much in terms of public comment as the original speaker who elaborated at length on the particulars."

I have reviewed Carolyn Craven's Public Comments submitted on April 15, 2019 and agree that it is essential for Cascade County to review and update the Growth Policy prior to any further discussion of the draft zoning regulations put forth by the Planning Division in January 2019.

MCA 76-1-601(2)(f)(ii) requires the local government to review the growth policy at least once every five years and revise the policy as necessary. It is during this review that the community should determine if the existing goals and objectives are still appropriate or if they need to be updated. Cascade County's Growth Policy has not been annually reviewed during the Planning Board Annual Meeting (see page 9-1) and 2019 marks year five since it's adoption. There are many tools available to assist local governments in developing and updating growth policies. Montana Annotated Code. MT Local Government Board Handbook, Mt Planning Board Members Handbook, MT Growth Policy Resource Book, Planning for Growth in Montana, and MT Dept of Commerce Community Needs Assessment Process.

SEE ATTACHED

#### For Office Use Only

Date Received:	<u>5-9-19</u>	Date Reviewed:	<u>5-9-19</u>	Complete:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Carolyn K. Craven  
101 14<sup>th</sup> Avenue South  
Great Falls, MT 59405

April 15, 2019

**PUBLIC COMMENTS ON CASCADE COUNTY PROPOSED ZONING CHANGES**

**GROWTH POLICY**

*Thank you to Chairman Merja and the members of the Planning Board for accommodating requests for the later time and larger venue used for the March public meeting and for reading and responding to the public comments to date.*

There have been numerous public comments recommending that the 2014 Growth Policy be updated via a series of public input sessions prior to even thinking about changing any zoning regulations. Below please find references from *MT Code Annotated*, *MT Local Government Board Handbook 2011*, *MT Planning Board Members Handbook 2009*, *MT Growth Policy Resource Book 2009*, *MT Dept of Commerce Community Needs Assessment 2007*, and *Cascade County Growth Policy 2014* to reinforce the legal and ethical requirements to update the Growth Policy, which is due to be updated in May 2019. Based on the recommendations in these documents, it is likely that a Growth Policy update with numerous opportunities for public input via small groups and public meetings could easily take several months prior to beginning any possible zoning changes. I am respectfully requesting that the Planning Board will vote to “take some other action related to preparation of a growth policy” (SB 326) and vote to “prepare a growth policy to promote public health, safety, morals, convenience, general welfare, efficiency, and the economy” (MCA 76-1-106). I also respectfully request that the Planning Board provide numerous opportunities and venues for public input for a revised Growth Policy over the next several months. The information below provides several pertinent references from these documents as the basis for these requests.

*“Positive change requires a clear mandate, open meetings, succinct explanations, and plenty of opportunity for public input”.* Arlyne Reichert, Public Comments 3-9-19

*References*

- ❖ The 2003, Montana Legislature amended the 1999 growth policy statute through SB 326. The amended statute “Authorizes the planning board to recommend that a growth policy be adopted or not adopted or recommend that the governing body take some other action related to preparation of a growth policy after the public hearing.
- ❖ Upon request of the public body, “the planning board will prepare a growth policy to promote public health, safety, morals, convenience, general welfare, efficiency, and the economy”. (MCA 76-1-106)

C.K. Craven 04.15.19  
Homeowner

**1) MONTANA CODE ANNOTATED (MCA) 76-1-601**

Development of a Growth Policy (76-1-601, MCA): In Montana, a growth policy is an official public document adopted and used by local governments as a general guide for decisions regarding the community's physical development. Growth policies were previously known as, and you may still hear them referred to, as "master plans" or "comprehensive plans." A growth policy itself is not a regulatory document; rather, it is an official statement of public policy to guide growth and manage change for the enhancement of the community.

**2) Excerpts from MONTANA CODE ANNOTATED 76-2-203**

Criteria and guidelines for zoning regulations.

(1) Zoning regulations must be:

- (a) made in accordance with the growth policy; and
- (b) designed to:
  - (i) secure safety from fire and other dangers;
  - (ii) promote public health, public safety, and general welfare; and
  - (iii) facilitate the adequate provision of transportation, water, sewerage, schools, parks, and other public requirements.

(2) In the adoption of zoning regulations, the board of county commissioners shall consider:

- (a) reasonable provision of adequate light and air;
- (b) the effect on motorized and nonmotorized transportation systems;
- (c) compatible urban growth in the vicinity of cities and towns that at a minimum must include the areas around municipalities;
- (d) the character of the district and its peculiar suitability for particular uses; and
- (e) conserving the value of buildings and encouraging the most appropriate use of land throughout the jurisdictional area.

(3) Zoning regulations must, as nearly as possible, be made compatible with the zoning ordinances of nearby municipalities. History: Sec. 4, Ch. 246, L. 1963; R.C.M. 1947, 16-4704; and. Sec. 15, Ch. 582, L. 1999; and Sec 3, Ch. 87, L. 2003; and. Sec. 7, Ch. 446, L. 2009.

**3) Excerpts from MT LOCAL GOVERNMENT BOARD HANDBOOK 2011**

The planning board serves to advise the local governing body. The board may propose policies for: subdivision plats; development of public ways, places, structures, and utilities; issuance of improvement location permits; and laying out public ways and services. Upon request of the public body, the planning board will prepare a growth policy to promote public health, safety, morals, convenience, general welfare, efficiency, and the economy (MCA 76-1-106). The governing authorities shall also require the county planning board to recommend boundaries and appropriate regulations for the various zoning districts (76-2-204).

**4) Excerpts from MT PLANNING BOARD MEMBERS HANDBOOK 2009**

- County Planning Board, 76-1-211, MCA
  - At least one member of a county planning board must be a member of the governing board of a conservation district.
- Definitions 6-1-103. As used in this chapter, the following definitions apply:
  - (4) "Growth policy" means a comprehensive development plan, master plan, or comprehensive plan that was adopted pursuant to this chapter before October 1, 1999, or a policy that was adopted pursuant to this chapter on or after October 1, 1999. (p113)

C.K. Craven 04.15.19

Homeowner

- Relationship with Governing Body
  - As mentioned before, the planning board serves in an advisory function to the governing body (76-1-106, MCA). This combination of planning board recommendations and governing body decisions influences land use in a community. Because the relationship between the two bodies is so important, the two should meet periodically to discuss issues regarding community planning and land-use policy. If the governing body has certain policies it wishes to pursue, the planning board needs to understand them, and how the governing body would like to achieve them. Conversely, the planning board members should share their concerns and ideas with the governing body. Ultimately, the two entities may not agree on policy or how to implement it, but at least each will be informed so they can make decisions and recommendations accordingly.
  
- Community planning entails a lot of time, work and resources. It includes making difficult decisions and is neither quick nor easy. Ultimately it should be a process that benefits all Montanans by providing:
  - Sustainable rural lifestyles and vibrant cities and towns.
  - Conservation of rural landscapes.
  - Balance between economic growth and quality of life.
  - Education and engagement of the public.
  - A sound basis for land use decisions. (p22)
  
- Conservation of Landscapes
  - Planning can help conserve landscapes which provide important public benefits such as wildlife habitat, storage of floodwaters, groundwater recharge and view sheds that would be difficult and expensive to replace if damaged. (p23)
  
- In order for zoning regulations to be effective and legally sound, they must be developed in a manner that is consistent with the goals and objectives found in a community's growth policy. (p29)
  
- Public participation is not only required under statute, but local governments must encourage participation by developing local procedures for such purposes. Section 2-2-103, MCA, states that "Each agency shall develop procedures for permitting and encouraging the public to participate in agency decisions that are of significant interest to the public. The procedures must ensure adequate notice and assist public participation before a final agency action is taken that is of significant interest to the public." Adequate notification is critical for not only ensuring public participation but also to avoid any litigation that could arise for not following statutory procedures. Section 2-3-104, MCA spells out that "An agency shall be considered to have complied with the notice provisions of 2-3-103 if:
  - an environmental impact statement is prepared and distributed as required by the Montana Environmental Policy Act, Title 75, chapter 1;
  - a proceeding is held as required by the Montana Administrative Procedure Act;
  - a public hearing, after appropriate notice is given, is held pursuant to any other provision of state law or a local ordinance or resolution; or
  - a newspaper of general circulation within the area to be affected by a decision of significant interest to the public has carried a news story or advertisement concerning the decision sufficiently prior to a final decision to permit public comment on the matter." (p33)

### 5) Excerpts from MT GROWTH POLICY RESOURCE BOOK 2009

- The purpose of this publication is to help local officials and Montana citizens understand how they can work to manage change and preserve the quality of life in their communities through the tools provided by Montana's planning statute.

*\* In this publication, the term "community" or "communities" will be used broadly to include all of Montana's general-purpose local governments, towns, cities, and counties.*

- The Montana Environmental Quality Council report, *Planning for Growth in Montana*, identified several benefits of community planning, including the following:
  - 1) *Fosters wise and thoughtful investments in major public facilities, such as roads, water and sewer systems, solid waste, and fire protection.*
  - 2) *Makes communities safer and healthier by encouraging well-designed streets, protecting water quality, and deterring development in unsuitable areas such as floodplains, wetlands, fault zones, and unstable slopes.*
  - 3) *Helps to make a community more attractive to investment by businesses and industries.*
  - 4) *Protects special community values, such as historic, cultural, scenic and natural features, or rural, agricultural character.*
  - 5) *Builds public consensus and greater understanding of issues within the community.*
  - 6) *Promotes affordable housing.*
  - 7) *Identifies growth patterns that minimize the cost to provide local services and infrastructure.*
  - 8) *Maintains property values for residential, commercial, and industrial properties by preventing nearby incompatible or degrading uses.*
  - 9) *Ensures that adequate amounts of suitable land are available for residential, commercial, and industrial growth.*
- Many communities find that their land use policies are written after the fact as a consequence of subdivision review, rather than in advance through a thoughtful process of community planning.
  - A statement in the Great Falls City-County Comprehensive Plan sums up why any community, growing or declining, should plan for its future:
    - **"Planning allows the community to envision its future and proactively work to achieve it, instead of just reacting and moving from one short-range, quick-fix solution to another, as events occur."**
- In the 2003, Montana Legislature amended the 1999 growth policy statute through SB 326. The amended statute:
  - Authorizes the planning board to recommend that a growth policy be adopted or not adopted or recommend that the governing body take some other action related to preparation of a growth policy after the public hearing.  
*(Under the previous statute, the planning board was only authorized to recommend the proposed growth policy, regardless of the comments received at the public Hearing.*  
*(p11)*

- Section 76-1-601, MCA identifies several elements that must be addressed as part one of the growth policy. The statute does not define the extent to which each element must be described. The **required** elements include: *[among ten total required elements]* (p13)
  - Community goals and objectives;
  - Maps and text that describe the existing characteristics and features of the jurisdictional area (including information on land uses, population, housing needs, economic conditions, local services, public facilities, natural resources, and other characteristics);
- In order for zoning to be effective (and legal), the zoning regulations must be consistent with the goals and objectives identified in the growth policy. (p46)
- Under Montana statute, planning boards are the only public entities authorized to prepare growth policies. Creating a growth policy takes considerable time and effort by the planning board and its planning staff or consultant. The more thorough the process is, the more time will be necessary for completing the plan, developing the implementation tools, and carrying out the policy. (p15)
  - It should be noted that MCA sections 76-1-601(2)(f)(ii) and (iii), require the local government to include as part of the growth policy *“a list of conditions that will lead to a revision of the growth policy; and a timetable for reviewing the growth policy at least once every 5 years and revising the policy, if necessary.”* It is during this review that a community should determine if the existing goals and objectives are still appropriate or if they need to be updated. (p21)
- One of the most important phases of the development of a growth policy is the articulation of community goals and objectives. The development of goals and objectives provides the philosophical framework for the growth policy. The growth policy goals and objectives are statements describing the way the community wants to develop socially, economically, and physically. They are intended to guide the growth and development of the city, town, county, or other planning area covered by the growth policy. (p18)
- The EQC report, *Planning for Growth in Montana*, encourages a “community visioning process” as a preliminary step in defining goals and objectives. “Community visioning” is defined as “a process through which a community imagines the future it most desires and then plans to achieve it.” According to the EQC report, an advantage of this approach is that it results in a positive statement and emphasizes areas of agreement. (p18)
  - The EQC report *“concluded that more emphasis must be placed on planning and implementation measures rather than relying on subdivision review alone to address growth.”*
- Since the goals and objectives are the foundation for the growth policy, broad public participation in the formation of those goals and objectives is crucial to assure the success in developing the growth policy and implementing it. Public participation in local decision making is fundamental to our democratic process of government. Public participation cannot be ignored, or poorly planned and carried out. While successful citizen participation is a crucial element in developing a growth policy, it is also possibly the greatest challenge in the process. (p22)

- The growth policy must describe the projected long-term trends for each of the inventory items and other elements proposed by the planning board and adopted by the governing body. (p24)
- A land use study is basic to effective land use planning and to the use of implementation tools as zoning or subdivision regulations. A land use study analyzes the way in which community lands are being used: (residential, commercial, industrial, agriculture, public, transportation). Sometimes information may be easier to analyze in tables or charts. However, maps depicting information are likely to be more easily understood by the general public. Therefore, most land use studies use maps show various information (e.g. topography, vegetation, parcel density, road networks), supported by descriptive, analytical narrative and documentation. One of the best ways to begin a land use study is by creating base maps. These are maps that visually show you the inventory of your community: roads, parcels, public facilities, lakes, streams, rivers, vegetation, wildlife, floodplains etc. (p25)
- Closely related to projected land use is the topic of access and transportation. The physical layout and spatial arrangement of the land uses have to be logically related to a transportation network that provides efficient movement of people and goods. (p29)
- Along with the land use study, the physical and environmental characteristics and constraints of a community must be assessed within the geographic limits of the planning area. Physical and environmental characteristics and constraints are some of the most important factors in determining which areas are most appropriate for development. In this element of the growth policy, information on topography, slope, geology, soils, vegetation, hydrology, wildlife, climate, flood and earthquake hazards, and other topics are presented. The interrelationships between different physical and environmental characteristics and suitability for development, human activities, and land uses should be considered. It is especially important that environmental constraints for different types of land development activities and land use activities be identified. Key natural (i.e. prime agricultural lands, big game winter range, wetlands, floodplains) and historical or archaeological resources that may need additional protection or accommodation should also be identified. (p33)
- MCA 76-1-601(2)(c) requires *“projected trends for the life of the growth policy for each of the following elements: land use; population; housing needs; economic conditions; local services; natural resources; and other elements proposed by the planning board and adopted by the governing bodies”* be included as part of the growth policy. (Note that the only topic described in the data-gathering section above that is not included here is public facilities. That is because the statute specifically requires the development of *“a strategy for development, maintenance, and replacement of public infrastructure, including drinking water systems, wastewater treatment facilities, sewer systems, solid waste facilities, fire protection facilities, roads, and Bridges”*). (p35)
- MCA 76-1-601(2)(d) requires that the growth policy must have *“a description of policies, regulations, and other measures to be implemented in order to achieve the goals and objectives established pursuant to [this planning process].”* (p37)

- Summary: A variety of background information and studies are undertaken to produce a greater understanding of the community, and as preparation for guiding growth. Such broad topics as economics, population, land use, transportation, physical land characteristics, public facilities, public services and housing are examined in varying detail, related to each other. Information sources include published and unpublished documents, private citizens in the local communities, and local, state, and federal public agencies or non-profit organizations. Those characteristics and items capable of being mapped are graphically displayed on base maps of the planning area. Visually depicting such information through maps, charts, or graphs helps the public to discern physical relationships and the public and local officials to draw conclusions and develop action plans. A summary of any related background or special studies should be made available for public review in an easily understandable format. (p36)

#### **6) Excerpts from CASCADE COUNTY GROWTH POLICY 2014**

- The Cascade County Growth Policy serves as a comprehensive plan to provide guidance on decisions regarding land development and public investments.
  - Because growth policies have a significant impact on the ability to develop private land, a thorough public involvement process is critical to formulating these strategies.
  - This growth policy's designated growth areas are the result of time intensive public involvement efforts.
- The first Cascade County Development Plan was created "through the use of community surveys, citizen advisory committees, public hearings, and citizen comments (Cascade County Growth Plan 2014, (p11)
- Subsequent iterations of the Cascade County Growth Plan involved extensive public involvement including "public hearings, conducted in Monarch, Sun River, Centerville, Cascade, Belt and Great Falls" with opportunities for additional public input, ideas and suggestions.
- In the current 2014 Cascade County Growth Plan, the authors stated that "more extensive updates to the Growth Policy may require a re-write with additional public participation in the future".

(p12)

**I strongly urge we follow the above recommendations of our county leaders!**

- In Chapter 3, Public Participation, of this 2014 Growth Policy, the authors wrote that:
  - Since the goals and objectives are the foundation for the growth policy, broad public participation in the formation of those goals and objectives is crucial to assure the success in developing the growth policy and implementing it. Public participation in local decision making is fundamental to our democratic process of government.
  - Public participation cannot be ignored, or poorly planned and carried out. While successful citizen participation is a crucial element in developing a growth policy, it is also possibly the greatest challenge in the process.
  - Good public participation can highlight concerns and issues not always apparent to the local planners or officials. It can provide a voice for diverse interests and helps a community "buy into" the reasons for a growth policy. If the public has been part of the process then they will have "ownership" of the final document. An additional benefit of public participation is that when properly documented, it gives significant legal support to the growth policy when it is officially adopted by local government. Growth policies that reflect the vision of a community through citizen participation and that comply with Montana's statutory requirements will generally withstand most legal challenges.

7) Excerpts from COMMUNITY NEEDS ASSESSMENT PROCESS / MT DEPT OF COMMERCE 2007

*"The future now depends on people all over the country working together to make things better in their particular place. It depends on people in different kinds of places - large and small towns, urban and rural neighborhoods - asking themselves what can we do to make this community a more hopeful place to be young, a more rewarding place to work, and a more friendly place to grow old."*

Alice Rivlin, former Director of the Congressional Budget Office & Vice-Chair of the Federal Reserve Board

- This can be an excellent opportunity to ask "what's good about our community and how can we make it better?" Identify the positive aspects of the community and develop a strategy for building upon them to make the community an even better place to live.

Thank you for the opportunity to submit public comments.

Respectfully submitted,



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