

# Swan Valley Regional Plan

## Element comments

Name: Swan Valley Elementary School Board

Contact information

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If you have changes you would like to address, please state the particular element, the section and page number. State area of concern and suggested correction text. Please feel free to contact anyone on the community council with any questions you may have. Once our community has finalized the Regional Plan, it will be sent to the county for their review and comments.

General Comments:

This document is too long, making it difficult to read and contains much information that is already in existence either as written policy, regulation or narrative in the current Missoula County Growth Policy or as natural resource information in the newly completed Flathead National Forest Plan.

The relationship between “Objectives, Policies and Actions” is confusing. Nor is it clear who exactly is going to accomplish the objectives, set policies, or take actions. Many of the actions appear to be thinly disguised efforts to impose regulations on land use in the Swan Valley in excess of current laws. The Community Council currently does not have the authority or power to do any of these things.

So presumably the document is speaking to Missoula County. It appears to be biased in favor of zoning and regulation while at the same time acknowledging, “... there was no significant support

for regulations to accomplish these objectives.”

The action items are particularly problematic and vague with no clear indication of who if anybody is responsible for implementing them, much less evaluating their successful completion. Many of the actions as proposed are actually regulatory in nature, yet the regional plan is not supposed to be a regulatory document. Others are more of a “wish list” that is not tethered in reality with either a funding source or accountability to the public. There are some actions that would be more appropriate as goals. We suggest deleting all actions that imply regulation or are a “wish list.” We suggest promoting those actions that are more suited to be goals. See the detailed comments for specifics.

The document is filled with language that is in essence regulatory, such as: “this plan recommends the use of “wildlife friendly” fencing when new fences are built or old fencing is repaired.” Then after six lines of editorial about wildlife friendly fencing the document disclaims in bold: “ **At this time, there are no regulations on fencing in Missoula County, and any and all decisions about the type of fencing and materials used rest with the property owner.**”

*This propose to regulate, but wait, wait we are really aren't proposing regulation* discourse continues throughout the document. It contributes to the excessive length, verbiage and weakens the document through the editorializing of opinions rather than stating facts.

Most of this can be resolved by grounding the document’s narrative in facts. Simply cut out excessive language, and eliminate all verbiage promoting a political point of view. Discard superfluous descriptions that are outdated, misleading, and incorrect or at best only an opinion.

This plan does not have a central unifying approach or voice of the Valley and as such it lends itself readily to being interpreted in almost any fashion by the reader. Unfortunately this means that Missoula County will interpret it to support their particular agenda for the Swan Valley rather than seeing or hearing the document speaking with the voice of the Valley. This runs counter to the stated purpose of: “We seek to ensure that the Swan Valley community maintains its independence, cultural and historical heritage, and wild ecosystems.”

Finally while giving lip service to the idea that new residents and businesses are welcome in the Swan Valley, the reality is this document is not friendly to new business or development of any kind. It misses the opportunity to set a tone of friendly support with positive language to the prospective new resident or business. Instead there is an emphasis on a negative, restrictive and regulatory approach. This document needs to be significantly edited and cut down to a manageable size.

Respectfully submitted by the Swan Valley Elementary School Board

James Boyd, Lonnie Casebolt, John Mercer, Nathan Richardson, Randy Williams

See the following for specific comments:

## Introduction, pages 4 thru 6:

Page 5:

**Goal:** The lack of specificity here renders these goals unlikely to be attained. In addition there is no reasonable measure specified for attainment, nor is any entity identified as responsible for achieving much less assessing progress toward the goals.

**Policy:** This documents suggests a considerable number of policies – but has no power to require implementation of policies as stated.

**Actions:** Again there is a lack of specificity about who or what entity is responsible for actions.

The document states it “... draws heavily on the *Upper Swan Valley Landscape Assessment, 2004*, sponsored and prepared by the Swan Ecosystem Center, and the *Draft Swan Valley and Condon Community Profile, 2010*, prepared by the Growth Policy Committee of the Swan Valley Community Council.” Yet the former is now 14 years out of date and the latter is 8 years out of date. And there is no mention of the recently completed Flathead National Forest Plan that has the most current and updated information about natural resources in the Swan Valley.

On Page 6, delete the last paragraph. It is unnecessary, speculative and editorializes a point of view, stating opinions rather than presenting facts.

## Natural Resources and Environment, (1.0 thru 1.15) pages 7 thru 17:

### 1.1 Forest Communities

Delete unnecessary, refer instead to the Flathead National Forest Plan.

The map states Upper Swan Valley Ecosystems Map. The Upper Swan Valley does not have distinct ecosystems. It is a small part of the Northern Continental Divide Ecosystem. This map is of a scale that is useless in land use planning and cannot be replicated on the scale required for site assessment. It cannot be replicated because there is no clear objective science determining where the boundaries of the so-called ecosystems lie on the ground.

## 1.2 Habitat Types

Delete refer to Flathead forest National Plan for a discussion of potential wildlife habitat.

## 1.3 Surface Water Quality

Water Quality is good, Delete everything else.

Combine 1.4, 1.5, 1.6, and 1.7 in to one short section describing species of concern

Delete wildlife friendly fencing, as it serves no purpose in this document.

1:10 this section is out of date and inaccurate. Refer to the new Flathead National Forest Plan.

1.13 Delete regulatory language

1.14 Delete regulatory language

Page 17

Promote Action 2 to become a goal # 5

Delete actions 1, 3,, 4, 5, 6, 7

## Economic Development, (2.0 thru 2.4) pages 18 thru 23

Page 19

Economics gives short shift to the importance of home-based business in the economy of the valley. The document focuses on highway frontage: what it calls main street. It does not articulate the diversity, resilience and importance of the home-based business in the Swan Valley. Nor does it acknowledge that the home-based business is likely to be the best source of new and continued economic vitality in the valley. Instead it focuses on the Highway and promotes a regulatory stance that sees residential and business properties as separate. It fails to note that any effort to zone or regulate the home-based business beyond what existing state laws provides will have major adverse impact to the valley's economy.

### 2.1 Barriers to econ development

Well intentioned action plans that require additional studies, restrictions or approvals from non-existent committees beyond what is currently required by state law add both economic hardships and barriers that preclude the small business from establishing in the swan valley. The risks of unknown costs and extended time frames present a significant barrier to economic development.

### 2.4 Page 23

Move actions 3, 5, 6 and 7 to goals Delete actions 1, 2, 4, and 5

## Land use: (3.0 thru 3.12) pages 24 thru 31:

3.5 This is full of excess verbiage describing what already exists in terms of regulation by the State and Missoula County. Delete excess verbiage

3.6 This is a thinly disguised attempt to impose regulation on any new developments in the Swan Valley. It is full of regulatory language and excess verbiage. Suggest deleting.

3.9 This section is full of excess verbiage describing what Missoula County already does and suggests additional regulation beyond what is required by state law and county regulation.

3.12

Actions Promote #4 to goals, delete 1,2,3,5,6

Housing: (4.0 thru 4.5) pages 32 thru 35:

4.5 Actions delete #1

Transportation: (5.0 thru 5.6) pages 36 thru 38:

5.6 Actions Promote 1, 2, 3 to goals

Public Facilities & Services: (6.0 thru 6.10) pages 39 thru 44:

6.10 Actions Promote 1,2,6,7,8,9 to Goals Delete 3, 4, 5

Implementation: (7.0 thru 7.8) pages 45 thru 49:

This contains a lot of discussion about what needs to be done with no identification of how or who will pay for it. This likely will place an undue and expensive burden on any new development in the Swan Valley. It needs to be edited and shortened to eliminate the excess, speculative verbiage.

## Appendices A-D

These appendices contain a lot of excess verbiage, and tend to go on about how to regulate and are somewhat short on facts. Suggest deleting all but factual information

Appendix A—Element 1 Natural Resources (1.3) Page 50 thru 51

Appendix B—Element 1 Natural Resources (1.4 Bull Trout Habitat Conservation) page 50 thru 51.

Appendix C—Element 1 Natural Resources (1.12 Ground Water Quality)  
Page 51

Appendix D—Element 3 Land Use (3.5) page 52