

From: [Brynda Larsen](#)
To: [Council](#)
Subject: [EXTERNAL] Zone Change Application 1074
Date: Sunday, November 23, 2025 10:37:39 PM



Gentlemen of the City Council,

I am writing to express my opinion on Zone Change Application 1074

I would like to address Zone Change Criteria numbers seven and eight, which focus on promoting compatible urban growth and respecting the character of the district.

The application seeks to change the zoning of agricultural land to N2, NX1 and CMU1. However, it is crucial to consider the surrounding area, which is comprised of low density single-family homes. This zone change would create a discrepancy that directly contradicts the aim of fostering compatible urban growth. The placement of NX1 (multiple-family homes with up to 4 units) adjacent to 1 acre homes is incompatible and incongruent. The Citizens of the West End appeal for a well planned, well organized, and intentional community.

Successful zoning not only facilitates development but does so in a way that honors the history, needs, and desires of the existing residents, thereby fostering sustainable and harmonious urban growth. The combination of these criteria serves as a foundation to ensure that new developments enhance rather than disrupt our neighborhoods.

The growth of the West End rapidly exceeds our infrastructure. Improvement of Rimrock, Grand, and Central Avenues are past due. Our schools are burgeoning and exceed student enrollment capacities.

I believe that growth and development should preserve our district's unique character and foster a cohesive community. Therefore, we urge the council to consider the potential impacts of this zone change carefully and to ultimately deny zone change application 1074.

Thank you for your time and consideration.

Brynda Larsen
1145 Bluegrass Drive West

From: [Tony Gaffke](#)
To: [Council](#)
Cc: [Tony Gaffke](#)
Subject: [EXTERNAL] Zone Change Request #1074 Barber Farms
Date: Sunday, November 23, 2025 1:22:25 PM



Dear City Council Members,

My name is Joy Gaffke, my address is 4602 Liahona Lane, Billings, MT 59106, and I am a resident of the Sundance Subdivision, which borders the proposed Barber Farms development and **Zoning Change Request #1074** by Performance Engineering. I am writing to share my concerns and opposition regarding the current plan and its potential impact on the surrounding neighborhoods.

The proposed development is not consistent with the character and zoning of the established adjacent neighborhoods. The plan does not resemble any neighboring subdivisions north of Central Avenue. It includes limited parks, trails, and green space, creating a flat “postage stamp” of duplexes, and raises concern that future residents may rely on amenities maintained by Sundance homeowners to the west. Traffic along Central Avenue is already significant, and with the 44 West Subdivision under construction, additional density will further increase congestion and safety risks. The rapid pace of this project also raises concerns about long-term impacts on property values and neighborhood stability. Furthermore, the layout and aesthetics do not align with the residential quality and zoning patterns of the area, particularly north of Central Avenue traveling west.

Your attention to my letter is important to me, as it ensures the voices and concerns of neighboring residents are heard. We understand that someone will develop Barber Farms at some point. It would be reasonable and logical for the Zoning Board to propose that Performance Engineering design the development with **lower-density single-family homes along the outer edges, transitioning to higher-density housing toward the center**. This approach would provide a balanced and thoughtful connection between neighborhoods while maintaining the integrity of the area, rather than creating a stark high-density rental subdivision adjacent to low-density, residentially owned homes.

Thank you for your time, consideration, and continued service to our community.

Please confirm receipt of this email.

Sincerely,

Joy Gaffke

4602 Liahona Ln.

Billings, MT 59106

From: [Tony Gaffke](#)
To: [Council](#)
Cc: [Joy Gaffke](#)
Subject: [EXTERNAL] Zone Change Request #1074 Barber Farms
Date: Sunday, November 23, 2025 1:18:47 PM
Attachments: [Information Packet Presented to Zoning Board Re Zone Change Request 1074.pdf](#)
[Zone Change Request 1074- Zoning Definitions for CC.pdf](#)



Dear City Council Members,

My name is Tony Gaffke, and I am the homeowner at 4602 Liahona Ln, Billings MT 59106 of the **Sundance Subdivision**, which borders the proposed Barber Farms development and Zoning Change Request #1074 by Performance Engineering. I am submitting this letter to express my concerns and opposition regarding the current proposal and its impact on surrounding neighborhoods.

After reviewing the plan in the context of the City of Billings' 2016 **Growth Guidelines**, it is clear that this request does not align with critical planning objectives:

- **Objective 7:** Ensure new zoning promotes compatible urban growth.
- **Objective 8:** Consider the character of the district and the suitability of the property for the proposed uses.

The Barber Farms parcel is bordered on three sides by established suburban neighborhoods—**Cloverleaf Meadows, Sundance, and Shiloh Estates**—all zoned N3 or N4. Sundance, immediately west, contains 125 lots with a minimum size of approximately one-third acre. By comparison, the Barber Farms proposal would place a minimum of 350 units on a parcel of similar size. This density is significantly higher than surrounding areas, producing a development that is out of scale, incongruent, and incompatible with existing neighborhood character.

The current plan includes minimal parks, trails, or green space, resulting in a compact, stark island layout of duplex-style units. This not only fails to reflect the residential character of adjacent N3 and N4 neighborhoods but also raises practical concerns regarding traffic along Central Avenue, safety, long-term neighborhood stability, and potential reliance on amenities maintained by existing subdivisions.

A responsible development plan would respect neighborhood continuity while accommodating new growth. One feasible solution would place **lower-density N3 single-family homes along the perimeter**, transitioning to **higher-density N2 lots internally**, creating a natural gradient between Barber Farms and surrounding subdivisions. This approach aligns with the City's Growth Guidelines and promotes a development that is compatible, logical, and sustainable for the area.

We respectfully request that the developer, in collaboration with the Zoning Commission, City Planning, and neighboring subdivisions, work toward a **reasonable and mutually acceptable plan**. If such collaboration does not yield a suitable solution, the Barber Farms Zoning Request #1074, as currently proposed, should be denied.

Thank you for your time, service, and careful consideration of these points.

Respectfully,

Please see the attached information packet we presented to the Zoning Commission as well.

Please acknowledge receipt of this email.

Tony Gaffke

Tony G Realty

Tony & Joy Gaffke

TonyGaffke.com

tony.gaffke@century21.com

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INFORMATIONAL PACKET

Presented by

Sundance Subdivision Residence

Regarding

City Zone Change 1074

Barber Farms Subd. /Performance Engineering-Cal Kunkel

The Barber Farms lot is currently proposed for development by Cal Kunkel and Happy Homes. Happy Homes has numerous developments around the City of Billings, most recently the duplex units to the west of Costco. Attached to this packet are photographs of various Happy Homes developments throughout Billings, as well as photographs of the neighborhoods which directly abut the property – Sundance Subdivision, Cloverleaf Meadows, and Shiloh Estates Subdivision. The distinctions between the three are glaring and clearly demonstrate how “unique” such a development would be, when compared to the surrounding neighborhoods.

In 2016, the City of Billings published its 10 “Growth Guidelines”, outlining the public policy objectives that must be considered prior to approving a zoning change. It is critical to note that the developer bears the burden of proving that these objectives weigh in favor of approval. If the developer cannot meet this burden, the proposed zoning plan **should** be denied. The residents of Sundance Subdivision (125 homes) are nearly united in our opposition to the current proposed zoning plan, no. 1074, as we believe it is currently violative of Billings public policy, as discussed below.

(1) Is the new zoning designed in accordance with the growth policy?

- a. The safety of all users and the connectivity of the transportation system are important criteria to consider in roadway designs and transportation plans.**
Based upon our calculations, the proposed development plan will include a minimum of 350 units. We have concerns that this large increase in population may strain Fire Station 7, ambulance services, and police response.
- b. Public transit and commercial air service are critical to ensure access to and around the city.** We have no knowledge of this factor and are not aware of any plans to run bus lines to the proposed subdivision.
- c. Developed parks that provide recreation, special amenities (community gardens, dog parks, viewing areas), and active living opportunities are desirable for an attractive and healthy community.** In contrast to the subdivision under construction on the south side of Central Road, the Barber

Farms proposed zoning plan does not include trails and provides minimal green space. Out of the total 55.46 acres of developed land, only 1.12 acres (a mere 2.1%) is earmarked for park system. Considering the number of units proposed, one acre of park seems insufficient. We can only presume that residents of the proposed subdivision would venture across Central to use the newly developed trail system within that subdivision, or use the Sundance Subdivision Park, the maintenance of which residents of Sundance Subdivision pay for monthly through HOA dues. Otherwise, this proposed subdivision seems to be a mass of housing, with no redeeming qualities from an aesthetic perspective.

- d. The safety of all users and the connectivity of the transportation system are important criteria to consider in roadway designs and transportation plans.** Sundance Subdivision residents, and those in the surrounding neighborhoods, already experience heightened traffic, depending on the time of the day. This traffic will only increase once the subdivision on the southern side of Central is completed. For example, at the traffic light at Grand/48th, when parents are seeking to drop children off for school at the Billings Christian School, the line of vehicles has occasionally stretched from 48th to Shiloh. During normal evening rush hour, the line at the stoplight often starts near Cloverleaf Meadows. We can only assume traffic along Central will increase dramatically, and there is currently insufficient infrastructure to account for the current residents, let alone a dramatic increase. At a minimum, a traffic impact study should be completed prior to groundbreaking.
- e. Natural landscapes are important because they define the uniqueness of Billings and help protect the environment.** We are currently unaware of any natural landscapes that would be incorporated into the plan.
- f. Infrastructure and service investments that stabilize or improve property values, secure future utility costs, consider maintenance costs, and improve our environmental quality far into the future (i.e., energy efficient) are desirable.** Considering the relatively quick timeline for this development, neighbors in Sundance (as well as surrounding neighborhoods) are concerned about negative impacts on property values. A gentle transition from N4 to N3 to N2 housing (and eliminating NX1 from the proposal), with N3 zoned properties directly abutting the surrounding neighborhoods would greatly alleviate these concerns.
- g. A cost/benefit study is important to make cost effective land use decisions.** We are unaware of any study being conducted, let alone completed.

(2) Is the new zoning designed to secure from fire or other dangers? Our expectation is that the City would require the developer to adhere to all city regulations concerning fire and other hazards. We are unaware if the current plan meets that requirement. This factor is, at best, neutral.

(3) Will the new zoning promote public health, public safety, and general welfare? As highlighted above, neighbors in Sundance have great concerns about the impacts of increased traffic along Central, absent a substantial investment into necessary infrastructure. At a minimum, it is impossible to claim that this proposed zoning plan **increases** public safety, public health, and the general welfare of the surrounding residents, and is at best, neutral.

(4) Will the new zoning facilitate the adequate provision of transportation, water, sewage, schools, parks, and other requirements? The zoning proposal clearly does not properly account for adequate park systems and green space. As discussed previously, this project can easily be contrasted with the 44 West subdivision on the south side of Central. In that subdivision, there are trail systems and green space, sufficient for the residents to enjoy. Here, the developer has proposed the minimum allowable green space, 2%, instead seeking to pack more housing into a confined area, without accounting for the quality of living of the residents, and surrounding neighborhoods. Concerning water, sewage, and schools, we can only assume that city services will be extended, as the lot size does not accommodate septic systems. At best, this factor is neutral – however, considering the vastly insufficient park system, and that impact on surrounding neighborhoods, the objective likely leans in favor of denial.

(5) Will the new zoning provide adequate light and air? Our expectation is that the City would require the developer to adhere to all city regulations concerning light and air quality. Sundance residents have concerns about the potential for 4 story residential buildings in the NX1 zoning area, which could potentially impact this factor.

(6) Will the new zoning affect motorized and non-motorized transportation? As discussed previously, residents are already concerned about traffic and congestion, and this concern will only become more pronounced once the 44 West subdivision is complete. Without a substantial investment in infrastructure, traffic will only get worse. This factor must weigh in favor of denial, unless the developers are willing to make that dramatic investment.

(7) Will the new zoning promote compatible urban growth? Sundance residents, as well as those in Cloverleaf Meadows, Shiloh Estates, and other neighborhoods, have great concern about this proposed zoning plan. The Barber Farms lot is presently an island, surrounded on 3 sides by N3 and N4 residential homes. The application acknowledges as much – stating that the property is “nestled between low density residential on the north, east, and west sides.” As a compromise, we propose a gentle transition between N3 zoned lots on the perimeter of the Barber Farms subdivision, transitioning into denser, N2 lots in the middle. This proposal balances the per lot cost-basis for the developer, while ensuring that the neighborhood matches the communities it borders, along with furthering the goals of a high-quality life for new and existing new residences, reducing potential conflicts between neighbors, and improving the appearance of land use. Further, having such a transition into denser housing will foster a sense of community with surrounding subdivisions, rather than the proverbial “stick out like a sore thumb.” Quoting from the 2008 Growth Policy, adopted in 2023, a proposal such as this would foster a predictable land use policy, consistent with neighborhood character and preferred land use patterns identified in surrounding neighborhood plans, such as Sundance and Cloverleaf. As presently proposed, the subdivision would be radically different from the surrounding neighborhoods, and accordingly, must weigh in favor of denial. If, however, a gentle transition plan is considered, it would be supported by the community and would weigh in favor of approval.

(8) Does the new zoning consider the character of the district and the peculiar suitability of the property for the particular uses? We incorporate our comments to the previous. However, with the addition that Billings Zoning Regulations consider arterial streets to be lines of demarcation between zoning plans. The 44 West subdivision on the south side of Central should not be considered when determining the character of the district. Rather, the well-established neighborhoods such as Cloverleaf Meadows and Sundance should be considered. This factor must weigh in favor of denial, assuming the current zoning plan.

(9) Will the new zoning conserve the value of buildings? At best, this factor is neutral. It is impossible to accurately predict the impact on the value of the surrounding homes, without years of data. Neighbors in Sundance (and Cloverleaf) certainly have worries about a decrease in value, but those worries are nothing more than suspicions. Similarly, any assertions by the developer that this project would have a neutral impact, or a positive impact, are just the same – suspicions.

(10) Will the new zoning encourage the most appropriate use of land throughout the

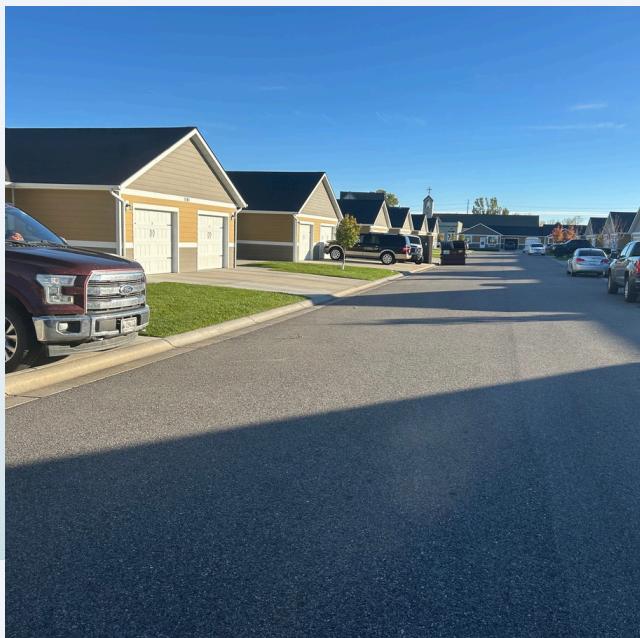
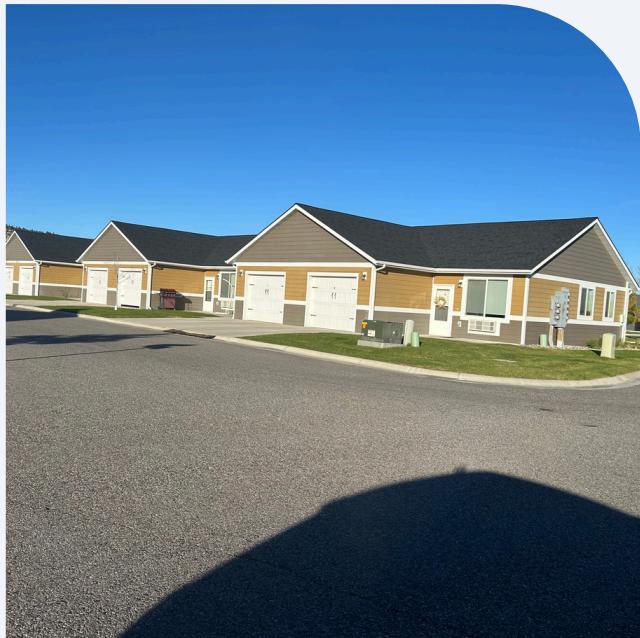
City of Billings? This is best left for the City of Billings to determine. We recognize that current Billings public policy favors denser residential communities. We are aware that the Barber Farms lot will not remain a field and are not naïve enough to believe that the lot will be filled with N4 lots. We recognize that the lot will be developed into a neighborhood with higher density housing than both Cloverleaf or Sundance. However, we simply request that the City and developer consider our concerns and engage in good-faith discussions concerning proposals to meet us half-way. We have proposed a gentle transition from N4 (Cloverleaf) and N3 (Sundance) to the higher density homes, with a buffer zone of N3 homes on the perimeter, with N2 homes in the center. We are completely supportive of such a plan. We simply don't want to be forgotten in this decision.

Conclusion. To conclude, considering the zoning plans as presently constructed, objective no. 5 weighs in favor of approval, nos. 4, 6, 7, and 8 weigh in favor of denial, and nos. 1, 2, 3, 9, and 10 are objectively neutral.



N2 Neighborhood Exhibit 1a: Bitterroot (Billings Heights)

N2: Mid-century neighborhood residential. The N2 district is intended to continue the existing character of the residential neighborhoods with single- and two-family homes developed during the middle of the twentieth century. This district may also be used for new neighborhoods designed with similar characteristics of the mid-century neighborhoods. These characteristics include homes wide on the lot, proportionate garages located in the front façade, low pitched roofs, and doors and windows on the front facades. Building and garage location are specified in the regulations, with basic parameters for front doors and windows.



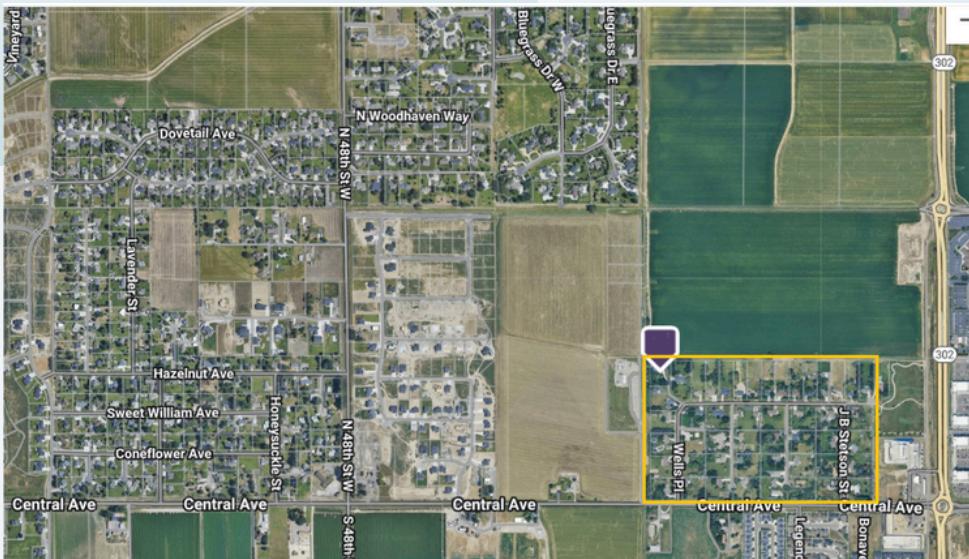
N2 Neighborhood Exhibit 1b: Wheatbaker Development NW Grand/Shiloh

N2: Mid-century neighborhood residential. The N2 district is intended to continue the existing character of the residential neighborhoods with single- and two-family homes developed during the middle of the twentieth century. This district may also be used for new neighborhoods designed with similar characteristics of the mid-century neighborhoods. These characteristics include homes wide on the lot, proportionate garages located in the front façade, low pitched roofs, and doors and windows on the front facades. Building and garage location are specified in the regulations, with basic parameters for front doors and windows.



N2 Neighborhood Exhibit 1c: Billings South Shiloh Development (North West of Costco)

N2: Mid-century neighborhood residential. The N2 district is intended to continue the existing character of the residential neighborhoods with single- and two-family homes developed during the middle of the twentieth century. This district may also be used for new neighborhoods designed with similar characteristics of the mid-century neighborhoods. These characteristics include homes wide on the lot, proportionate garages located in the front façade, low pitched roofs, and doors and windows on the front facades. Building and garage location are specified in the regulations, with basic parameters for front doors and windows.

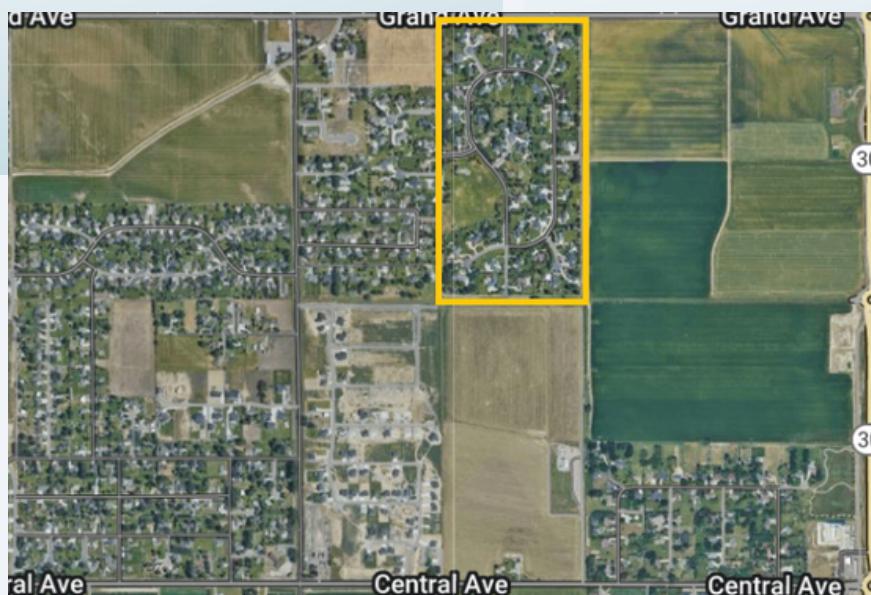
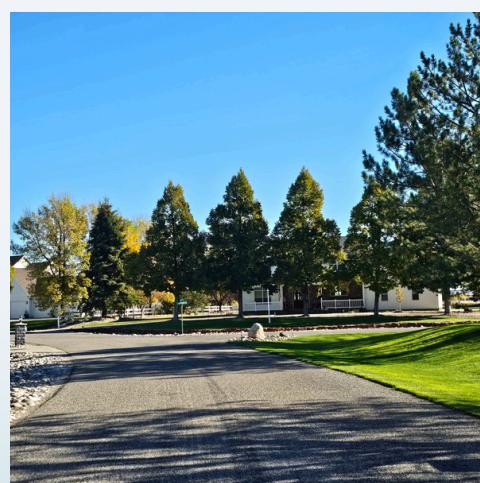
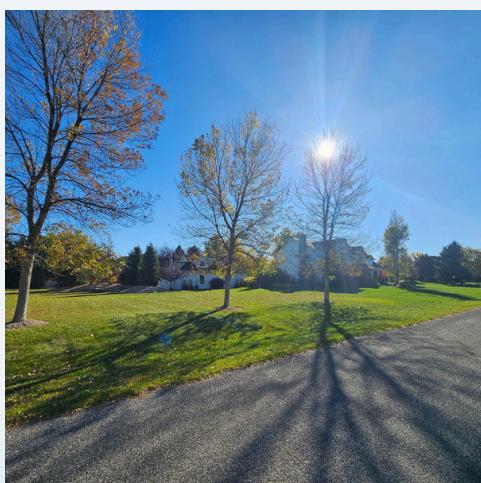
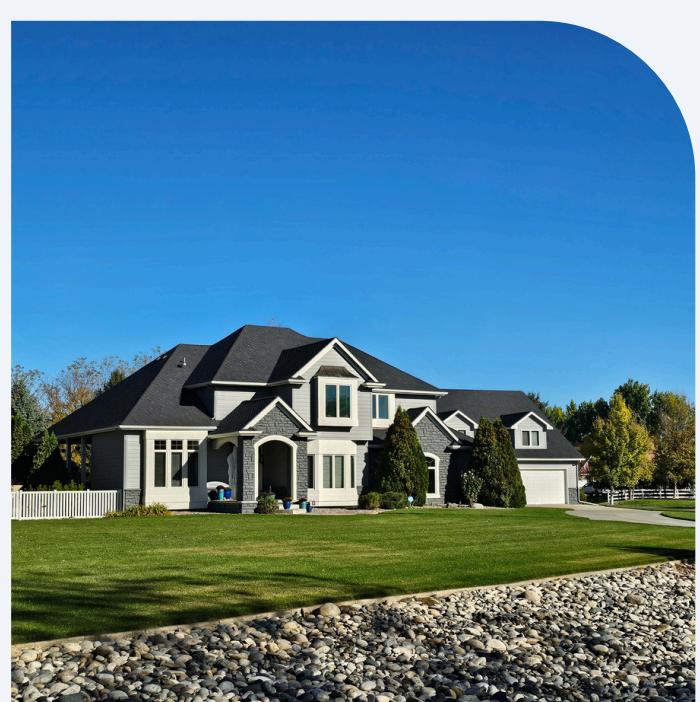
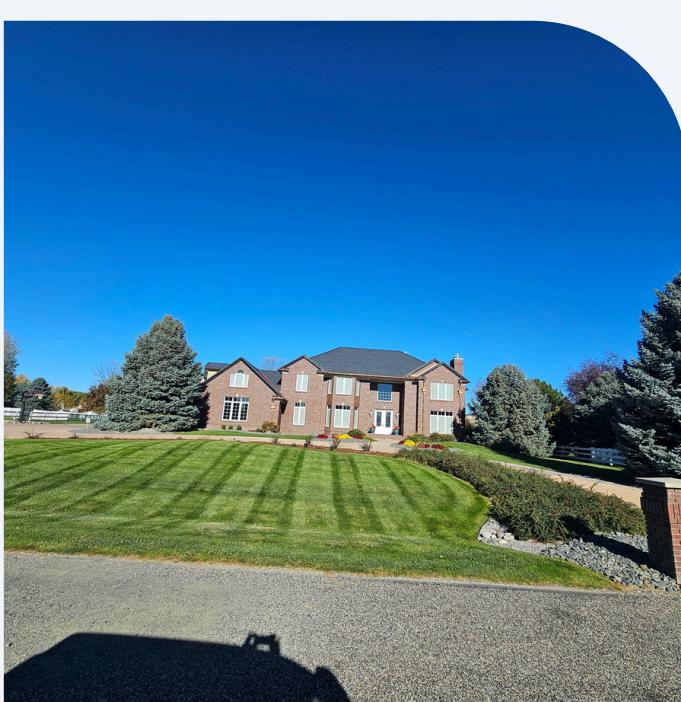


Suburban neighborhood
residential. The N3 district is intended for residential neighborhoods primarily with single-family homes. Characteristics include wide lots and attached garages typically located on the front building façade, often greater than thirty-five (35) percent of the façade. Basic setback and height parameters apply.

N3/N4 Neighborhood

Exhibit 2a: Shiloh Estates Boarders

South East Corner of Barber Farms



The same districts shall face each other across streets, including existing districts.

This requirement excludes existing Yellowstone County zone districts RR, A, RMH, RMH-R, or **N4**. Similar districts within the same district category (e.g., NX1 and NX2 districts) may be located adjacent to or across the street from the new districts.

N3/N4 Neighborhood

Exhibit 2b: Cloverleaf Subdivision

Directly North of Barber Farms



Suburban neighborhood residential. The N3 district is intended for residential neighborhoods primarily with single-family homes. Characteristics include wide lots and attached garages typically located on the front building façade, often greater than thirty-five (35) percent of the façade. Basic setback and height parameters apply.

N3/N4 Neighborhood

Exhibit 2c: Sundance Subdivision

Directly West of Barber Farms