

**From:** Travis Ross <[tross@missoulacounty.us](mailto:tross@missoulacounty.us)>

**Sent:** Thursday, March 12, 2026 10:21 AM

**To:** Jennie Dixon <[jdixon@missoulacounty.us](mailto:jdixon@missoulacounty.us)>

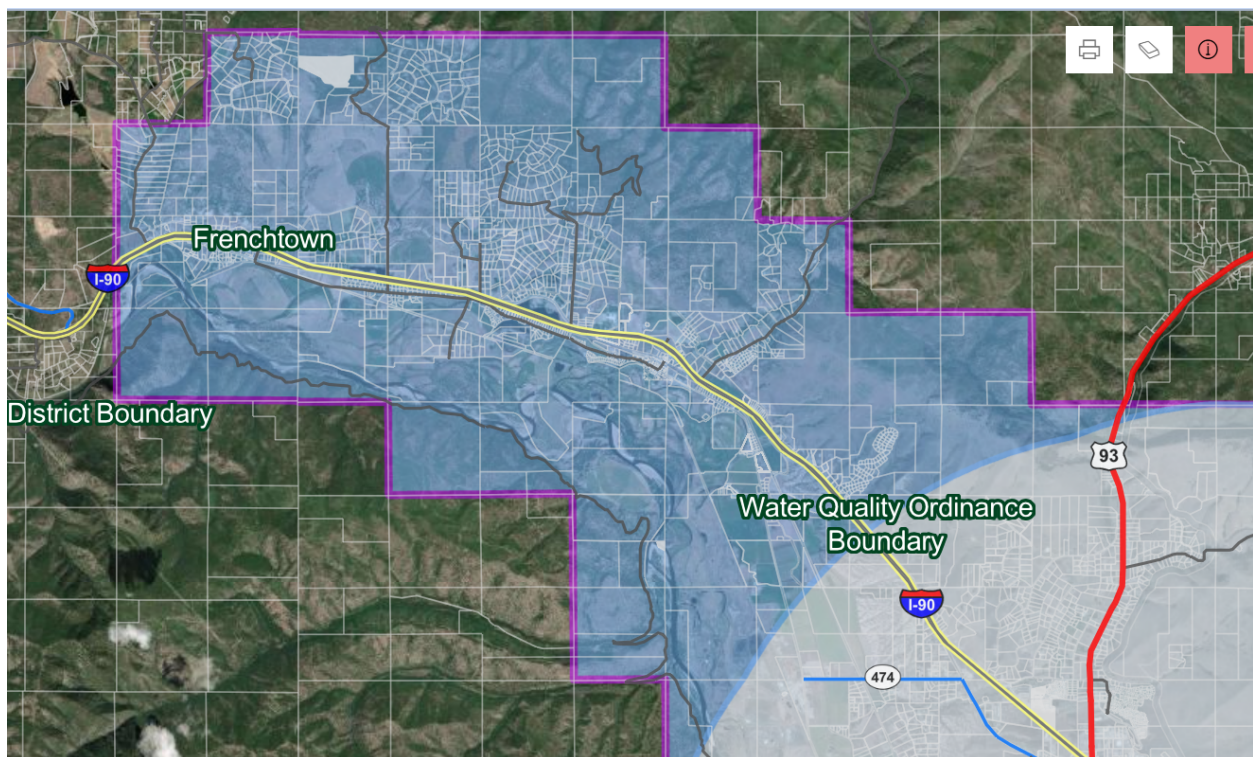
**Cc:** Elena Evans <[eevans@missoulacounty.us](mailto:eevans@missoulacounty.us)>; waterquality <[waterquality@missoulacounty.us](mailto:waterquality@missoulacounty.us)>;

Shannon Therriault <[stherriault@missoulacounty.us](mailto:stherriault@missoulacounty.us)>

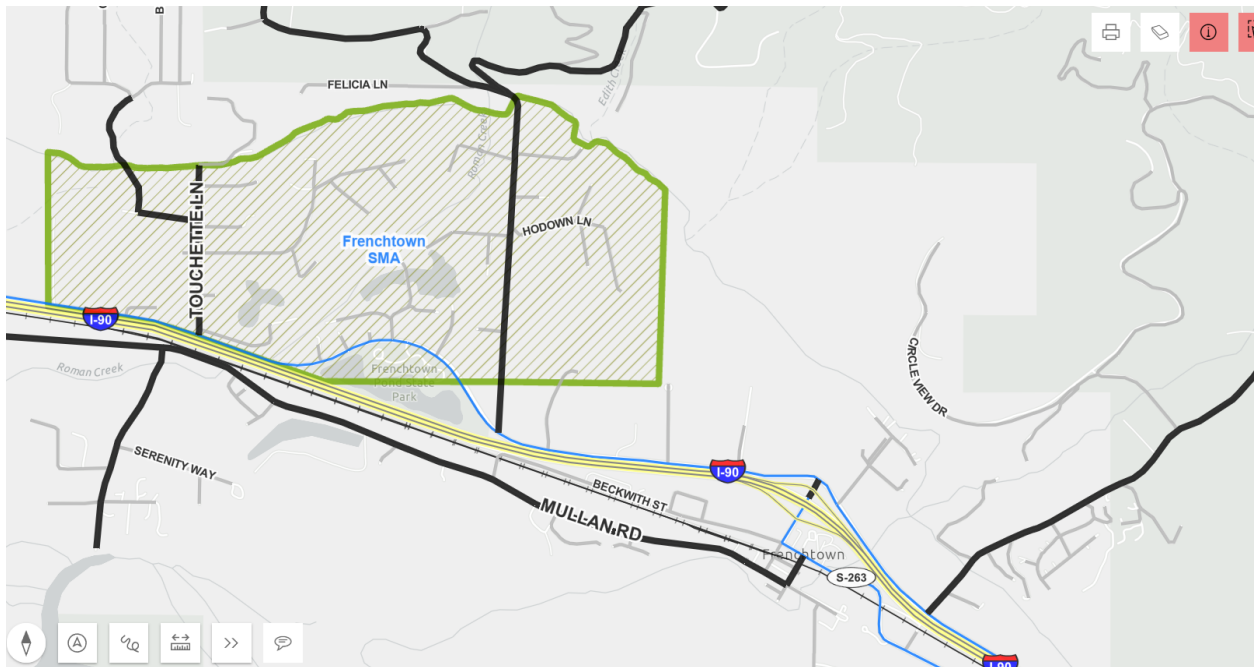
**Subject:** RE: REQUEST FOR AGENCY COMMENT: Frenchtown Interchange Zoning Initiative (DUE March 10, 2026)

Hi Jennie -

This zoning proposals falls within the Water Quality District boundary. Within this boundary, our Department is able to conduct research, carry out annual groundwater sampling and analysis, track water levels, etc. It is, however, **outside** of the Water Quality **Ordinance** boundary. This Ordinance has been in effect since 1994 and establishes protections for groundwater and surface water through a number of means including regulating how commercial/industrial facilities use and store hazardous substances and how to manage stormwater runoff. This ordinance covers all areas within the District that **also** fall within a 5 mile buffer of the City of Missoula. Frenchtown is outside of this ordinance boundary and therefore does not have the same level of groundwater protections in place that are provided at the Wye, Lolo, Bonner and urban Missoula, for example.



The District has conducted research in the vicinity of the proposed zoning district (approximately ½ mile to the west). Groundwater in this area is shallow. Seasonally, in places it is within 10 feet of the ground surface. There is not a protective layer of clay above this aquifer. The Frenchtown Irrigation Ditch runs May to October and artificially raises the water table during this time due to water leaking from the ditch. The gradient of the aquifer is also quite flat meaning that groundwater does not flow through the area as quickly as it does in the alluvial aquifer of urban/suburban Missoula Valley. Contaminants do not “flush” through the system as readily. In the mid-1980’s a study was conducted approximately ½ mile west and found above-average occurrences of bacterial contamination in private wells. The Health Board established a Special Management Area (SMA) in that area, limiting development that uses onsite wastewater disposal systems until such time as the cause of the contamination is established and the problem is corrected. Follow-up studies have been and continue to be conducted but this cause of contamination has not been definitively established and so the SMA remains in effect.



Zoning can be an effective tool in providing water quality protections by recognizing sensitive areas and resources and establishing guidelines in developing these areas without causing unacceptable harm to natural resources. As such, the District supports this proposal which limits the geographic scope of commercial activities that are permitted in this area of known shallow groundwater. The District further advocates for prohibiting or conditioning types of development in the allowed commercial zones that present unacceptable risk to groundwater quality. This is within the EPA-designated Missoula sole source aquifer, meaning it is the primary source of drinking water and there are no viable alternatives.

Thank you for the opportunity to comment.

**Travis Ross R.S. (he/him)**  
*Water Quality Specialist*  
*Missoula Valley Water Quality District*

406.258.4964  
301 West Alder, Missoula, MT 59802  
[MissoulaPublicHealth.org](http://MissoulaPublicHealth.org)

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