



Subject: Line-by-line review of previously adopted economic development chapter edits

Dear Members of the Whitefish Community Development Board,

Thank you for taking the time to review the Economic Development chapter that you adopted previously, and to review all of the adopted edits line-by-line, thereby allowing the public to view all of these edits and to comment on them. As an organization focused on improving housing affordability, we find many of the adopted edits to be troubling, and would urge you to reconsider reverting back to the original language created by city staff in many instances. We will summarize these below.

- We encourage you to add back the line that reads, “we will endeavor to provide a full range of goods, services, and jobs to serve our local population.” (page 2, “Vision”)
 - Removing this sentence (and goal) does not make sense, as this is an aspiration that the city should have. Requiring residents to travel to Kalispell or Columbia Falls for basic necessities increases the cost of living in Whitefish, and is a disservice to and an effective tax on residents.
- We encourage you to adopt the staff-provided language on page 3, paragraph 3, rather than the edits provided by the Heart of Whitefish.
 - Residents who commute out of the city to work have not necessarily “chosen” to do this. It is a fact that there are many more jobs (and many more high-paying jobs, required to afford housing in Whitefish) located in Kalispell than there are in Whitefish. As Kalispell is a larger city, some of this is to be expected. However, framing this as a choice is not factual. The other deletions in this paragraph aim to replace facts with the opinion of a small minority of downtown special interests and should be reverted to the original staff-provided draft for this reason.
- We encourage you to add an additional sentence that reads, “Developing a more diverse, year-round economy outside of tourism could help sustain businesses and create stable jobs throughout these shoulder seasons.” to the end of paragraph 3 on page 5.
- We encourage you to remove the sentence that reads, “Thus, visitors have contributed significantly to the livability of the community for residents.” as this is strictly opinion based on one’s subjective view of “livability.” We imagine that many people could and would argue that high levels of tourism in Whitefish have reduced livability by increasing the cost of living significantly and making it much more difficult to get around town during peak seasons. This is also based on data above it that states that ~60% of resort tax collections are attributable to visitors, meaning that locals also pay into this fund substantially.



- We encourage you to add back the sentence that reads, “According to a report from GSBS consulting, 76% of workers employed in Whitefish do not live in Whitefish.” on page 6, last paragraph.
 - This is important context for the current housing affordability problem in Whitefish, and removing this does a disservice not only to those workers who can not afford to live here, but to those who will update this Growth Policy in the future.
- We encourage you to remove the misleading sentence at the bottom of page 6 that continues on page 7 that reads, “According to the Executive Director of Housing Whitefish, the average monthly rent per person for rental assistance applicants was \$800, offering a more accurate picture of the cost of living for working residents.”
 - This figure appears to be based on these residents having one or more roommates, and the rental assistance program does not cover 100% of working residents. Many (most?) working residents continue to pay substantially more for rent each month, and this misleading statement is an attempt to dismiss how significant the housing affordability problem is in Whitefish.
- The survey data about tourism sentiment cited on page 7, paragraph 5 should include response rates for each survey. We suspect that the 2023 survey included more responses than the 2025 survey, and that the 2025 survey may have been skewed with responses towards those who benefit from the tourism industry. If true, the citation of these surveys is problematic.
- We encourage you to revert to the original language drafted by staff on page 11, paragraph 2. This was edited to change a factual statement by staff that “many” public comments (during visioning sessions)...expressed the desire for more locally available goods and services to read instead “a few” public comments.
 - This represents a narrow special interest attempting to rewrite history and silence contrary opinions. This is unacceptable.
- We encourage you to add back staff’s language on page 11, paragraph 2 that reads, “In addition to zoning review, strategies discussed in the study included encouraging more ‘temporary’ businesses such as ‘pop up shops’ or food trucks.”
 - The list provided here is clearly not all-inclusive, and the deletion of this sentence is unnecessary and appears to be motivated by one or two persons’ disdain for things like food trucks. It should be remembered that this document is not zoning policy, and attempting to close the door on future opportunities by removing them from this document is unacceptable, controlling behavior by unelected special interests.
- Beginning on page 13 and continuing onto page 14, multiple inappropriate deletions were made. This section summarizes a consultant’s report, and as such, the deletions of items in the list on page 14 is inappropriate. These deletions are simply attempting to remove assessments from a report that the special interest who provided these edits does not personally agree with. Again, this is inappropriate.



- We encourage you to add back the objective on page 15 that reads, “Review zoning to diversify business locations and to encourage necessary local serving goods and services near local population centers.”
 - Zoning, both residential and commercial, by its very nature, is and should be fluid. Attempting to shut the door on this by removing this objective is short-sighted, and does not adequately prepare Whitefish for the future. This deletion appears to be driven by a narrow downtown business special interest in avoiding any and all competition. This deletion is attempting to write zoning policy, which is inappropriate for this unelected Board to do.
- On page 16, we encourage that you revert back to staff language for items d and e.
 - By adopting language that states “prohibit,” rather than the language provided by staff, the Board is again attempting to write zoning policy rather than a guiding comprehensive planning document.
- Additionally on page 16, we encourage you to add back the deletions of items h and j.
 - These deletions again represent the Board attempting to write zoning policy while silencing the voices of residents who participated in the visioning sessions.
- On page 17, we encourage you to add back objectives d and e, for similar reasons provided on the items immediately above.
- References should be cited for all factual information changed, including:
 - Changing \$400 million to \$200 million on page 3, paragraph 2.
 - Changing \$314 million to \$1 billion on page 4, last paragraph, as well as the changed figures in the continuation of that paragraph on the next page.
 - Changing figures for Glacier National Park visitation on page 5, paragraph 3.
 - Provide the citation as a footnote for the VisaVue data cited on page 6, paragraph 2.

Thank you for your consideration of these points. We ask that you take a holistic view of the entire community, both in the present and especially in the future, which we will not be able to predict. We ask that you err on the side of flexibility and expanding the options available to future city councils as they contemplate changes as Whitefish evolves, rather than erring on the side of entrenched special interest groups with an apparent goal to further erode the Whitefish local community by ensuring that no one who is not extremely wealthy can live here.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathan Dugan".

Nathan Dugan, President