

DEPARTMENT OF PLANNING, DEVELOPMENT & SUSTAINABILITY

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April 17, 2026

Dear Mr. Dobler,

Missoula County has completed an initial review of the Special Exception Application submitted on March 25, 2026, for the proposed data center facility at 9314 Bonner Mill Road.

As described in the application materials, the proposal consists primarily of interior improvements within an existing industrial building, with new exterior development limited to the installation of cooling towers and associated equipment. The request for Special Exception review is triggered by the proximity of the proposed use to residentially zoned and/or developed property within 500 feet.

Accordingly, the County's review is focused on whether the proposed use, including its associated exterior equipment and continuous operation, will be compatible with nearby residential properties and whether potential offsite impacts can be avoided or mitigated, consistent with the approval criteria in Section 11.6 of the Missoula County Zoning Regulations.

Based on this review, the application is not complete. While the submittal provides a general description of the proposed use, several impact areas related to exterior equipment and operational characteristics rely on generalized statements and are not supported by sufficient technical information to allow evaluation under Section 11.6.

To proceed, the following information is required:

**1. Noise Analysis (Section 11.6 – compatibility with surrounding area; protection of adjacent properties)**

Provide information sufficient to evaluate noise generated by all exterior and building-mounted equipment associated with the proposed use, including cooling towers, pumps, transformers, and any backup power systems.

This information may be provided in one of the following forms:

- A. A noise analysis prepared by a qualified professional, modeling continuous (24-hour) operations and including projected sound levels at the property boundary and at the nearest residential receptors; or
- B. Documentation based on manufacturer specifications and site-specific calculations, including:

- Sound ratings (dBA) for all major equipment;
- The location of each noise source and distances to property lines and the nearest residential structures;
- Estimated sound levels at the property boundary and at the nearest residential receptors under worst-case operating conditions (i.e., all equipment operating simultaneously); and,
- Identification of any mitigation measures necessary to ensure compatibility with nearby residential uses.

**2. Visual Impact, Screening, and Lighting (Section 11.6 – neighborhood character; mitigation of adverse impacts)**

Provide visual simulations depicting the proposed cooling towers and associated exterior equipment as viewed from adjacent residential properties and public rights-of-way. Submit elevations and dimensions of all exterior equipment. Provide a landscaping and screening plan demonstrating year-round buffering of the cooling infrastructure, with species and size at planting.

The application states that no additional exterior lighting is proposed. Because the proposed use includes new exterior mechanical equipment operating on a continuous basis and located in proximity to residential properties, additional information is required to verify that lighting associated with the installation and operation of this equipment will not result in increased glare or light trespass to adjacent properties.

Please provide the following:

- Written confirmation that no new or modified exterior lighting will be installed or required in association with the cooling equipment or its operation; and
- If any new or modified lighting is proposed or may be required for operation, maintenance, or security purposes, provide fixture specifications (including lumen output and color temperature), mounting height, shielding details, and an assessment of light levels at the property boundary sufficient to demonstrate that glare and light trespass to nearby residential properties will be avoided or minimized.

**3. Operational Characteristics and Intermittent Operations (Section 11.6 – compatibility; impacts to adjacent properties; public welfare)**

Provide a detailed description of facility operations, including the continuous (24-hour) operation of mechanical systems, frequency and timing of maintenance activities, and any periodic or intermittent events that may generate noise, emissions, or other offsite impacts.

This should include, at a minimum:

- A description of normal operations, including continuous equipment operation;
- The frequency and timing of maintenance visits and activities;
- Identification of any periodic or intermittent operational events (such as equipment testing or system cycling), including when such events may occur (daytime vs. nighttime); and,

- Identification of all backup or emergency power systems, including type, fuel source, testing frequency, expected duration of operation, and associated noise and emissions.

Provide sufficient information to evaluate whether these operational characteristics, including intermittent and emergency activities, will be compatible with nearby residential properties and to identify any mitigation measures necessary to avoid or minimize impacts.

**4. Water Use and Cooling Equipment (Section 11.6 – protection of adjacent properties; potential offsite impacts)**

Provide additional information regarding the operational characteristics of the proposed cooling system sufficient to evaluate potential off-site effects on nearby residential properties. This should include:

- The number, size, and location of cooling towers and associated exterior equipment;
- A quantified estimate of operational water use;
- A description of system operation, including any evaporative processes; and,
- An evaluation of potential offsite effects, including visible vapor plumes, drift (water droplets), discharge, and the potential for icing conditions.

Supporting technical information shall demonstrate whether such effects could extend beyond the property boundary and, if so, identify measures to avoid or mitigate impacts to adjacent residential properties.

**5. Waste Heat and Thermal Effects (Section 11.6 – compatibility; protection of adjacent properties; general welfare)**

Provide sufficient information to evaluate whether heat rejected by the proposed cooling systems could cause localized temperature or comfort effects on adjacent residential properties. This shall include a description of heat rejection from the system, identification of discharge locations, and an assessment of whether measurable offsite temperature effects may occur. If such effects are possible, identify measures to avoid or mitigate impacts.

**6. Hazardous Materials and Safety (Section 11.6 – public health and safety)**

Provide an inventory of hazardous or regulated materials associated with the proposed use, including coolants, fuels, and battery systems. Submit a spill prevention and containment plan and describe fire suppression systems as they relate to the proposed use.

**7. Site Layout and Setbacks (Section 11.6 – compatibility; adequacy of site design)**

Provide a more precise and detailed site plan showing the final location of all proposed exterior equipment, including cooling towers, and distances to property lines and the nearest residential structures. This information is necessary to evaluate proximity-based impacts and the effectiveness of proposed mitigation measures. It may also be helpful to graphically depict the area/location your operation will occupy in the existing building.

**8. Section 11.6 Criteria Narrative**

Submit a revised narrative that directly addresses each applicable approval criterion in Section 11.6, specifically as it relates to the proximity of residential uses and the incremental impacts associated with the proposed equipment and operations. Responses

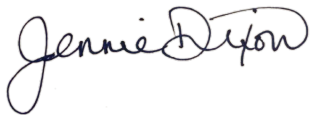
must be supported by the technical materials requested above and must demonstrate how potential adverse impacts will be avoided, minimized, or mitigated.

The County cannot make a determination of compatibility with adjacent residential uses, as required under Section 11.6, without the information identified above. Accordingly, the application will remain incomplete until all requested materials are submitted and reviewed. To remain on the June 3, 2026, Land Use Board agenda for this special exception, **please submit the requested information no later than April 29, 2026.**

Please note that additional information may be required upon review of the resubmittal to ensure a complete and defensible record for decision-making.

If you have questions regarding this request or wish to discuss submittal expectations, please contact me at (406) 258-4946 or [jdixon@missoulacounty.us](mailto:jdixon@missoulacounty.us). If you feel these issues are already addressed in your application, I would be happy to re-review the materials with you to ascertain completeness. I want to thank you for your willingness to provide a proposal that addresses the review criteria and takes steps toward impact mitigation. I look forward to working with you.

Sincerely,

A handwritten signature in cursive script that reads "Jennie Dixon".

Jennie Dixon, AICP, Planner IV

P.S. I would also note a minor typographical error on the top of page 11. The property is zoned ICH (Industrial Center, Heavy), not RS.