



Friends of Grant Creek
Wildfire Risk Task Force



April 26, 2021

Reference: 2920 Expo Parkway – 2021 Proposed Rezone

WILDFIRE LETTER #2 – ORIGINAL SUBMISSION ON APRIL 26, 2021

The owner of Grant Creek Village, KJA Development, LLC, is planning to submit an application to the City of Missoula for rezoning and development of its two parcels at 2920 Expo Parkway. KJA has filed a notice with City Planning of intent to apply for RM 1-45 zoning, the same classification that it applied for in 2020. KJA has informed the Friends of Grant Creek (FOGC) that it plans to erect four-story apartment buildings containing approximately 600 units, plus 75 condo/townhouse units.

Last year three of us, all experienced with wildland fire management, submitted a letter on August 26th concerning the 2020 Rezone application at this location. Since then, the FOGC Board of Directors has appointed five individuals to act as the Grant Creek Wildfire Risk Task Force. The Task Force hereby outlines, once again, our continuing concerns for the safety of Grant Creek residents and emergency personnel during wildfire emergencies in Grant Creek's Wildland Urban Interface (WUI). None of the concerns described in our 2020 letter have been remedied.

The wildfire hazard we have been discussing in this area has already been brought to our attention this year by a 4-acre car fire on April 2nd at mile marker 97 on I-90, just 4 miles down the interstate west of Grant Creek. West-bound traffic lanes were backed up for miles. And this was a small fire. This was just a reminder that the same thing could easily happen anywhere along the interstate, including within the city limits of Grant Creek.

<https://nbcmontana.com/news/local/vehicle-fire-causes-delays-on-i-90>

Wildfires and the Grant Creek WUI Including New Information

Wildfire is a fact of life in Missoula County and Grant Creek. In Grant Creek both timber fires in the northern sections, and grassland fires in the lower reaches of Grant Creek have the potential to prompt evacuations of residents and livestock. Using scientifically accepted methodology, we modeled fire behavior and produced wildfire projections that demonstrate the potential size and intensity of wildfires in both forest and grasslands in Grant Creek. While wildfire conditions during timber fires are easily envisioned by most residents of Montana, grass fires may be viewed as less risky to the general public when compared to forest fires. Part of our modeling provided insights on wildfires in the grasslands of lower Grant Creek. During adverse weather conditions that often occur in the late summer and fall, fires burning through these grasslands will spread at rates of 1/2 to 2 miles per hour and produce flame lengths ranging from 4 to 8 feet; a potentially life changing experience! We can discuss the outcomes portrayed by these models in depth with you at your convenience.

Although our analysis is based on computer modeling, recent events (Black Cat wildfire in 2007 and Schoolhouse wildfire, part of the Lolo Creek Complex in 2013) demonstrate the rapid spread and destructive potential of wildfires in grasslands surrounding Missoula.

All of Grant Creek north of Interstate 90 has been classified as WUI in the Missoula County Wildfire Protection Plan (CWPP) (2018). Simply stated, homes and property in Grant Creek are intermixed with, or adjacent to, wildland vegetation susceptible to wildfires.

Numerous reports describe the impact and potential of wildfire in Missoula County. The 2018 Missoula County CWPP also classified the majority of lands in Grant Creek as Moderate to Very High in terms of Wildfire Hazard Risk relative to other portions of Missoula County.

In a 2019 risk assessment study from Verisk Analytics, many Montana homeowners were found to be at High to Extreme Risk for wildfire loss. Their study found that, when ranked by

percentage of properties among the 13 most wildfire prone states and 2 Canadian provinces, Montana ranked 1st for the number of housing units with high or extreme risk from wildfire (29%).

<https://www.verisk.com/insurance/products/fireline/>

The Lolo National Forest is concerned enough about the buildup of hazardous fuels adjacent to private property that in October, 2020, forest managers initiated their *Wildfire Adapted Missoula* (WAM) project encompassing the Missoula area. This included specific areas of concern in Grant Creek. Our understanding is that Grant Creek is their 2nd highest priority after Blue Mountain.

https://www.fs.usda.gov/nfs/11558/www/nepa/114590_FSPLT3_5395825.pdf

In December, 2020 Montana Department of Natural Resources and Conservation (DNRC) issued the *Montana Forest Action Plan* <https://www.montanaforestactionplan.org/pages/forest-action-plan> which identified and mapped areas throughout the state with serious wildfire risk problems. It identified Grant Creek as a “**Priority Area of Focused Attention**” (emphasis added) in regard to hazardous fuels in need of treatment to reduce the risk of wildfire.

<https://www.montanaforestactionplan.org/pages/priority-areas>

In October, 2020, Headwaters Economics found that homes built between 1997 and 2018 in Missoula County ranked 2nd out of 10 counties in the following categories: Most Homes Built in High Wildfire Hazard Areas (1,256); Most Homes Built in Moderate Wildfire Hazard Areas (6,773); and Most Homes Built in Both Categories (8,029). (2020. Headwaters Economics. *Montana wildfire risk is widespread and growing.*) <https://headwaterseconomics.org/natural-hazards/montana-wildfire-risk-widespread>).

In February, 2021 another Headwaters Economics study identified as the main problem in residential development “**The WUI is the fastest-growing type of land use in the conterminous United States, growing 145% from 1990 to 2015. Today nearly half of the U.S. population lives in the WUI.**” (emphasis added). The same study also found that populated areas within the city limits of Missoula have, on average, a greater wildfire risk and greater likelihood of a wildfire than

53% of communities in the state. When compared to communities across the nation, populated areas of Missoula and Missoula County have, on average, a greater risk of wildfire and a greater likelihood of a wildfire than 83% and 84% respectively, of communities nationwide. (A Profile of Wildfire Risk: Missoula, MT; and Missoula County, MT; 2021, page 9, Headwaters Economics.) Downloadable under [Wildfire Risk Report for Every U.S. Community](https://headwaterseconomics.org/natural-hazards/wildfire-risk-report). <https://headwaterseconomics.org/natural-hazards/wildfire-risk-report>).

A February, 2021 Community Wildfire Planning Center study of Montana found that 64% of all housing units were located in the Wildland Urban Interface. This percentage was 20% higher than in any of the other 3 states (California, Colorado and Washington) that were part of the study. The report noted that “... **rapid development and a largely hands-off approach toward land use planning across the state may make curbing WUI growth a challenging process in the future.**” (emphasis added). https://www.communitywildfire.org/wp-content/uploads/2021/02/CWPC_Land-Use-WUI-Report_Final_2021.pdf

In March, 2021, the National Association of Forest Service Retirees (NAFSR) issued a Position Paper titled *America’s Forest Management Crisis - A National Catastrophe*. One of 6 major topics focusing on changes needed was *Massive Development in the Wildland Urban Interface* since the year 2000. Of concern to their organization was “... **the recent scale of development warrants a broader, more intensive communications strategy that highlights the tradeoffs between the gains from increased development and the risks and costs of further WUI development.**” Many of these individual members are retired Forest Service Chiefs, Regional Foresters and Fire and Aviation Directors, some of whom are Missoula and Missoula County residents. <https://www.nafsr.org/docs/2021/033121%20America's%20Forest%20Management%20Crisis.pdf>

Wildfire Evacuation and Access for Emergency Responders

In Grant Creek there is only one-way in and one-way out on the 2-lane narrow, shoulder-less Grant Creek Road. This road is the only escape route for everyone, residents and firefighters alike. A major evacuation of Grant Creek would be a complex operation with evacuees using the same route that would be taken by the Missoula City Fire and Police Departments, Missoula County Fire District #3 and Sheriff's Departments, and state and federal firefighting resources entering the canyon to deal with evacuations and fire suppression. The I-90 choke point and intersecting heavily traveled roads like Reserve Street and I-90 would further complicate a potentially chaotic situation.

Over 40 years ago, the Grant Creek Area Plan (1980) recognized the need for a comprehensive study of transportation prior to additional development. In that plan, Missoula City and County planners first referred to the I-90/Grant Creek Road intersection as a "bottleneck," citing their recognition of the recurring traffic problems that would come with development. Specifically, the document states that **"As Grant Creek develops, lower Grant Creek Road at the I-90 Interchange will also become a bottleneck."** (Emphasis added).

At that time the Planning Staff, County Surveyor and Missoula Transportation Technical Advisory Committee also recommended that specific requirements should be included in the scope of the traffic study concerning the future development of Grant Creek. Item No. 9 of these requirements included **"The location and design standards for alternate accesses to Grant Creek, i.e. Butler Creek and Coal Mine Road."** (emphasis added) (1980. *Grant Creek Area Plan*, Cultural Environment section, Transportation)

Since it is unclear whether these access studies were completed in the past, the Grant Creek Wildfire Risk Task Force, appointed and working under the direction of the Friends of Grant Creek Board of Directors, has conducted a preliminary examination of potential evacuation routes out of Grant Creek. Based on this preliminary exam, we could discover no other existing routes that are safe and suitable for wildfire evacuation, although some routes could be improved with permission of

private landowners and commitment of construction funds.

<https://www.missoulacounty.us/home/showdocument?id=27062>

The issue of inadequate evacuation route planning has become a serious problem in the western United States, especially where state highways may be the only evacuation route out of a community. In December, 2020, California may have been the first state to bring attention to this by issuing Evacuation Route Design Guidance Bulletin #93, in recognition of the need for better coordination with communities as a result of “Large wildfire events...”. <https://dot.ca.gov/-/media/dot-media/programs/design/documents/signed-dib-93-evacuation-route-a11y.pdf>

A decision to allow additional housing units and residences, in excess of current zoning, must consider the cumulative effects that future development has on wildfire evacuation. The proposed rezone at 2920 Expo Parkway is just one of several potential developments adding to traffic and impacting wildfire evacuations in Grant Creek. Summer recreational use at Snowbowl is projected to increase. More commercial lots are platted off Expo Parkway. We have learned that there is a platted subdivision above the existing homes at Glen Eagle Subdivision. There are also several large parcels (one since subdivided into five parcels) above this platted subdivision. Additionally, group homes are being considered for the 10 acres above the Snow Bowl parking lot adjacent to the city's soon-to-be-developed Bluebird North Hills Trailhead. (April, 2020. pers. comm. – Bert Lindler)

Conclusion

The 2020 Headwaters study pointed out that “It is important to anticipate inevitable wildfires and associated risks by planning developments and communities with wildfire in mind.”. The Montana Forest Action Plan (December, 2020) states “**As homes, businesses, and communities grow throughout Montana, the continued buildout of the WUI places lives and properties at great risk.**” (emphasis added). The National Cohesive Wildland Fire Management Strategy (2014) recommends that local jurisdictions “Pursue municipal, county, and state building and zoning codes

and ordinances that mitigate fire risk to protect life and property from wildfire.”

<https://www.forestsandrangelands.gov/strategy/nationalpriorities.shtml#map2>

Future opportunities to mitigate WUI growth through local regulations are jeopardized by recent efforts of the Montana State Legislature to restrict the authority of local governments to adopt zoning regulations. We conclude that the one opportunity the city may have in managing growth in the Grant Creek WUI is maintaining development at the limits proscribed within the existing zoning designation. Limiting further development at 2920 Expo Parkway to existing zoning may be the last opportunity for the city to provide for sensible growth in the Grant Creek WUI.

Thank you for your consideration of this new information that has become available since the 2020 rezone proposal, and of our continuing concerns for local residents and first responders.

Sincerely,

/s/ *Michael Cole*

Michael Cole, Team Leader

/s/ *Richard Lasko*

Richard Lasko

/s/ *John Langstaff*

John Langstaff

/s/ *Tim Hunt*

Tim Hunt

/s/ *RT Cox*

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