



Friends of Grant Creek
Wildfire Risk Task Force



April 12, 2022

Reference: 2900/2920 Expo Parkway Proposed Rezone

EXPO PARKWAY - WILDFIRE LETTER #3 – ORIGINAL SUBMISSION April 12, 2022

KJA Development, LLC, has submitted an application to the City of Missoula for rezoning and development of its two parcels at 2900 and 2920 Expo Parkway, known as Grant Creek Village. KJA is making application for RM 1-45 zoning (the same classification that was denied by the City in 2020), with a proposed maximum buildout of 625 multi-family housing units (including 105 existing units already built under the existing RM 1-35 zoning) and 75 townhouses.

This letter outlines concerns of the members of the Grant Creek Wildfire Risk Task Force, a group established in December, 2020 by the Friends of Grant Creek Board of Directors. Our five members live in lower, middle and upper Grant Creek, covering the broad variety of jurisdictions, housing densities, vegetation types and wildfire regimes. In addition to this letter, we are asking for your review of our previous communications with the city about this project during this rezone proposal review. These include communications as follows: a letter dated August 26, 2020 submitted to *Engage Missoula*; the public testimony of Michael Cole at a Missoula City Council public hearing concerning this property held on September 14, 2020 (public record – time 2:34:11 to 2:38:04 https://www.youtube.com/watch?v=ro4b-7_mveM); and a letter dated April 26, 2021 to local officials providing updated wildfire/egress related information. To date, none of the issues identified in these previous communications have been resolved.

We have also reviewed the *Risk Analysis, Fire Protection and Emergency Plan* and *Missoula Fire Department Correspondence* which are included as two exhibits in KJA's proposal. Both documents acknowledge that the proposed development is located in the Wildland Urban Interface and both address wildfire preparedness, construction and evacuation issues that are primarily site-specific to the development at 2900/2920 Expo Parkway. However, neither document addresses the incremental and cumulative effects of future Grant Creek development (allowed by current zoning) on wildfire evacuation on Grant Creek Road. Additionally, *The Risk Analysis, Fire Protection and Emergency Plan* focuses on "typical" Missoula fire weather and/or evacuation under ideal conditions, and ignores the complex weather, fire behavior and traffic conditions that lead to property loss and evacuations. Recent events in Montana and elsewhere demonstrate that such situations are not a question of *IF* but *WHEN*. We have addressed many of these issues in our past correspondence. The following sections contain information which is new since our previous communications.

Missoula as a Priority Fireshed

In May, 2021, the USDA, Forest Service, Rocky Mountain Research Station, published a research report, *Development and Application of the Fireshed Registry* (https://www.fs.fed.us/rm/pubs_series/rmrs/gtr/rmrs_gtr425.pdf). The research examines past, present and future trends regarding wildfire exposure to communities and forest and fuel management. The report provides a spatial assessment framework to specifically address wildfire risk to developed areas covering the continental United States, and identified "hotspots" of modeled transmission from wildfires originating outside of inhabited areas that have the potential to burn into residential and urban areas. **This research identified the immediate Missoula area (including Grant Creek) as the Number 1 Priority Fireshed in the USDA Forest Service Northern Region 1** (Appendix 2, page 40, Emphasis added). The USFS Northern Region includes North Idaho, Montana, North Dakota and northwestern South Dakota.

In perspective, the recent December 30, 2021 Boulder County, Colorado wildfire on the edge of the **Number 4 Priority Fireshed** in the USDA Forest Service Rocky Mountain Region 2 (Colorado, Wyoming, South Dakota, Nebraska and Kansas) destroyed over 1,000 structures (Appx. 2, page 41).

Increasing Wildfire Severity and Potential

Fire behavior is likely to continue to evolve into more severe events. Wildfire trends are currently outpacing mitigation measures. (March 26, 2022. Helena Independent Record.

https://helenair.com/news/state-and-regional/govt-and-politics/wildfire-trends-outpace-mitigation-measures/article_1c0ceca2-bfd0-54c6-ba2b-895477f328ba.html).

Recent research in the Rocky Mountains confirms that fire activity has changed significantly when compared to the past. The research report predicts “...unprecedented rates of burning expected in many western forests by mid-century...” and “Continued warming will reinforce newly emerging fire regimes, with significant implications for ecosystems and society.” (June 22, 2021. Proceedings of the National Academy of Sciences. *Rocky Mountain subalpine forests now burning more than any time in recent millennia.* <https://www.pnas.org/content/118/25/e2103135118>). Climate change in the Western United States is making wildfires worse by “...increasing the frequency and scale of high winds and hot dry weather.” (January, 2022. USDA Forest Service. *Confronting the Wildfire Crisis.* Page 16. <https://www.fs.usda.gov/sites/default/files/Confronting-Wildfire-Crisis.pdf>).

Based on current trends, factors such as an increase in burnable vegetation, drought, longer wildfire seasons and severe fire weather, wildfires are expected to intensify, resulting in increasing size, severity and rates of spread, further complicating fire suppression efforts and reducing the amount of time people have to safely evacuate from a confined canyon like Grant Creek. The weather parameters that firefighters have used in the past to determine when to disengage from a fire, the size

needed for safety zones, and other watchout situations may require continual modification as fire weather and fire behavior become more erratic and unpredictable. Likewise, the amount of time available to evacuate residents from a threatened area may be underestimated if residents and local government do not also adapt. This can no longer be business as usual. Growth allowed in the Grant Creek WUI needs to adapt as well. According to one researcher **“You have to plan for something even faster and more intense than we have seen.”** (Emphasis added). (November 21, 2021. The Gazette. *Colorado Springs wildfire evacuation models a source of contention: presentations today.* Five weeks after this statement - the devastating December 2021 fire in Boulder County, Colorado.

WUI Grassland Wildfires

Although the forested landscapes in Grant Creek represent a more familiar topic of discussion concerning potential for wildfire, grass fires should not be ignored as a potential wildfire threat in the Grant Creek WUI when the right weather and fuel conditions exist. Recent local grass fires along I-90 (April 2021) and on Waterworks Hill (July 2021) attest to the potential for wildfire ignitions on similar grasslands that exist within the Grant Creek, Butler Creek and Rattlesnake WUIs.

Recent December 2021 wildfires in Eastern Montana moving rapidly through grasslands provide examples of the impacts of grassland fire (December 2, 2021. New York Times. *Prairies on Fire in Montana Amid a Record December Heat Wave.* <https://www.nytimes.com/2021/12/02/us/montana-wildfire-drought.html>). On December 30, 2021, a grass fire in Boulder County, Colorado became the most destructive wildfire in the state’s history. (December 30, 2021. Reuters. *Wind-driven Colorado grass fire destroys hundreds of homes, displaces thousands.* <https://www.reuters.com/world/us/wind-driven-wildfires-prompt-evacuation-order-small-colorado-town-2021-12-30/>).

City and County Growth Policies, Open Space, and the WUI

In January, 2022, the USDA Forest Service published a report describing the current nationwide wildfire situation as a “crisis”. One of the three primary reasons listed for the growing risk is “...expanding development in the wildland urban interface.” With continuing climate change, “It will take a paradigm shift in land management across jurisdictional boundaries to reduce risk...”. (January, 2022. USDA Forest Service. *Confronting the Wildfire Crisis*, page 3). Due to the values at risk associated with people and private property, fighting wildfires in the WUI also significantly increase costs when compared to fighting remote fires, accounting for as much as 95% of suppression costs. (<https://www.fs.usda.gov/sites/default/files/Confronting-Wildfire-Crisis.pdf>).

In the opinion of some wildfire researchers, **“Few jurisdictions have the will or means to restrict further residential development in the WUI, although modifying and curtailing residential growth in fire-prone lands now would reduce the costs and risks from wildfire in the long term.”** (Emphasis added). (2017. Proceedings of the National Academy of Sciences. *Adapt to more wildfire in western North American forests as climate changes* <https://www.pnas.org/content/early/2017/04/11/1617464114>).

In 2020 the Missoula City Council approved the purchase of 350 acres on Mount Dean Stone, curtailing residential growth in fire-prone lands. Under the heading of Adapting to Climate Change and Protecting Human Safety, the stated goal of this acquisition was that it “...helps the Missoula community adapt to climate change by eliminating residential development in a high wildfire risk area, reducing wildfire risk to both structures and first responders.”

<https://www.engagemissoula.com/mount-dean-stone>

On September 20, 2021, Andrew Hagemeyer, Senior Planner with Missoula County Community and Planning Services Department, met with the Friends of Grant Creek Board of Directors. The

discussion concerned the Missoula County Zoning Update – Phase 2. During the meeting, several statements by Mr. Hagemeyer identified the position of the county in regard to development in Grant Creek. Mr. Hagemeyer stated that development in Grant Creek was “...maxed out...” with the exception of several random undeveloped lots within existing subdivisions and that Grant Creek was “...not an appropriate area for growth to occur.” He also stated that the county was “...not trying to change densities in Grant Creek within county (jurisdiction)...”. The county’s position, while very rational for a Wildland Urban Interface environment, is in direct conflict with the developer’s proposal a short distance away within the city limits at 2900/2920 Expo Parkway to change the existing zoning and *Significantly Increase* housing density.

Retaining existing zoning at 2900/2920 Expo Parkway would be another step forward in acknowledging that the WUI, even in a grassland fire environment, is not the appropriate location for increased density in the Grant Creek portion of the Missoula Fireshed. **The exact opposite of the stated goal for Mount Dean Stone would occur in Grant Creek if a zoning change is approved.**

Traffic

The term “full build-out” is found 9 times in the developer’s Traffic Impact Study 2021 Update. **If “full build-out” is the standard for calculating total vehicles in the development’s traffic analysis, then it should be applied equally.** City decision makers need to look at the cumulative, long-term effects of traffic and consider the maximum, approved/zoned, but not yet constructed, full build-out throughout Grant Creek, for calculating total vehicles in any traffic analysis, to determine all traffic that will use the Grant Creek Road for ingress/egress. This would include the total vehicle numbers for all approved subdivision vacant lots; approved residential building sites on larger private lands; approved parking spaces for the Snowbowl ski area expansion; estimated parking needs of the three approved commercially zoned lots on the south side of Expo Parkway; the maximum parking

capacity identified by Snowbowl in their overflow parking area in Lower Grant Creek; and the new Bluebird Preserve Trailhead directly across from the only two city street exits from the proposed Expo Parkway development <https://www.engagemissoula.com/bluebird-management-plan>.

According to researchers, evacuation planning needs to include traffic modeling. “It’s the nexus of fire behavior, communications and traffic modeling that is central to making evacuation decisions.” (October 7, 2021. The Washington Post. *After siege of blazes, experts say California must improve wildfire evacuation plans*. <https://www.washingtonpost.com/weather/2021/10/07/california-wildfire-evacuations-plans-inadequate/>). It needs to happen before development in the WUI, not afterwards.

In the fall of 2020, modifications were made to the intersection at Grant Creek Road/I-90. The traffic study provided by the developer prior to 2020 road modifications in support of the development at 2900/2920 Expo Parkway had serious flaws and these issues have been identified by others in previous correspondence concerning this proposal. The developer is continuing to use a seriously flawed traffic study to support the proposed development.

Since the traffic modifications were made, the developer had ample time and opportunity to correct this deficiency and conduct a scientifically-based, thorough traffic study related to this specific location. At a bare minimum, the developer’s October 23, 2019 seasonal traffic data could have been expanded to a 24-hour period that coincided with a single day or week during the height of both wildfire and tourism seasons between July 1 and September 10. But instead, for over 1½ years, both critical egress and the bottleneck conditions at the I-90 intersection, especially during this high traffic period, were ignored. There is no site-specific/seasonal specific traffic data available to support the rationale that the 2900/2920 Expo Parkway proposal will not have significant impacts on traffic in this confined area in the event of a large evacuation. In addition, using Orange Street data as a basis

for the developer's traffic study of Grant Creek does not take the following into account:

- 1) Residential/commercial traffic north of I-90 (this does not exist at the Orange Street exit)
- 2) Impact of traffic on the south side of I-90 where Reserve Street is also a major U.S. Highway
- 3) Reserve Street/U.S. 93 designated as a Hazardous Materials route off of I-90 at Grant Creek.

As a result of increased fire size and complexity, evacuation routes need to be “survivable in a traffic jam” for both residents and first responders. (E&E News. August 16, 2021. Calif. adapts to wildfire by urging people to flee/ <https://www.eenews.net/articles/calif-adapts-to-wildfire-by-urging-people-to-flee/>). On a one-way in, one-way out route like Grant Creek Road, the options will become even more limited in the future during a rapidly evolving wildfire.

Concluding Remarks

“Moral Hazard” is a term used by economists to describe a situation where people are less inclined to adequately prepare for disaster because they feel they are insulated from the consequences.

However, as wildfire risk increases as a result of world-wide climate change, insurance companies are more likely to drop insurance coverage or price people out of coverage to protect their own interests. <https://www.vox.com/22686124/climate-change-insurance-flood-wildfire-hurricane-risk>.

The same “Moral Hazard” term can be applied to decisions made by elected officials. Increasing development within the WUI provides more housing and increases tax revenues. If structures burn down, on-the-ground policy makers won't have to pay for it because it will come out of taxpayers' pockets. Short-term gain does not take into consideration the potential for long-term impacts in the event of a wildfire. (April 13, 2021. NPR) Fireline *Podcast. Episode 6 - Part 1: Moral Hazard (K. Barrett Portion of Interview)* <https://www.firelinepodcast.org/episode-06-part-1-moral-hazard/>.

Based on our experience, long-term impacts can be psychological, financial and community-wide.

In closing, we believe the extensive information we have provided to you over the past three years concerning the increasing wildfire threat and associated ingress/egress evacuation problems is clear and scientifically-based. Protecting the WUI and its residents from projected wildfire impacts needs to be a priority. The existing zoning gives you the means and opportunity in the Grant Creek WUI to help stabilize development, and still provide new housing. We do not support the rezone application.

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*

RT Cox