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First name: David

Last name: Strohmaier

Organization: Missoula Board of County Commissioners

Title: Chair

Comments: Dear Wildfire Adapted Missoula Project Leader:

Missoula County appreciates the opportunity to stay engaged in the Wildfire Adapted Missoula (WAM) Project and requests to be an interested party throughout the objection process. The project has many good features, and we feel much of the proposed work on National Forest System lands provides an array of benefits to those landscapes, including an approach that is more inclusive of fire on the landscape.

This letter is not intended to provide a particular objection, but rather to continue to highlight topics that are important to our community's wildfire resilience. We also hope this letter prompts continued collaboration to improve the project's place in comprehensive wildfire resiliency efforts in our community. This is particularly significant given the impacts of climate change, which present more extreme and dynamic wildfire conditions, and the continued growth of our community within the wildland urban interface.

Throughout the WAM analysis process, Missoula County has continued to stress the importance of the home ignition zone (HIZ) as a fundamental component to address structure protection and loss prevention. The amount of focus and effort directed toward addressing fire risk in the HIZ is directly related to the potential for structure ignition and conflagration, regardless of proximity to forested landscapes and forest management activities. The recent fire and destruction in the community of Denton, Montana, is a devastating and far too real example of this. The destruction in Denton highlights why our previous comments focused on the importance of the HIZ and the weak connection between fuel treatments remote from the HIZ and actual community destruction. Indeed, Denton was no anomaly. We know we have been very adamant about this, but please understand that our passion is directly correlated with our desire to not see similar devastation in Missoula County and not give private property owners a false sense of security that WAM treatments will appreciatively decrease community wildfire risk, or risk of home destruction from wildfire.

Articulating the importance of the HIZ to the public is critical to a comprehensive and transparent approach to conveying the true realities of what contributes to community wildfire resiliency. The WAM record of decision and subsequent project implementation communication present an opportunity to make this crystal clear. We cannot allow our collective inability to be consistent in

messaging to lead members of the public to be complacent in their own role in protecting their property and contributing to community resiliency. As a result, we will continue to advocate for an emphasis on the importance of the HIZ in addition to landscape resiliency efforts and public safety response, regardless of political or jurisdictional boundaries. While we recognize we each have unique authorities and responsibilities, we also firmly believe that we won't be effective together if we approach things from our own sides of the fence.

In reviewing the detailed Forest Service response to our comments on the Environmental Assessment, we began to sense a conversation that was moving away from collaborative engagement and potentially toward an adversarial relationship - something we do not feel would be beneficial. We intended our citations provided in previous comment letters to explore technical information on structure ignition and wildland-urban fire disasters based on structural and community characteristics - not specifically oriented to wildfire intensity.

Our interest and comments have not been in the spirit of halting or interfering with forest management efforts. Rather they are in the spirit of working with the Forest Service to make the WAM project more effective. This

work must parallel efforts to restore ecologically appropriate wildland fire and create community ignition resistance for preventing wildland-urban fire disasters. We should define the purpose and need of forest treatments in a way that actually aligns with the intended outcomes on the ground. Again, no forest fuels requiring treatment to decrease crown fire exist near Denton, and Denton burned. A bystander noted in the media, "It was hailing embers."

In light of our firm statements on an HIZ approach to effectively reduce community wildfire risk, we continue to recognize the positive ecological outcomes associated with much of the proposed work in WAM. Missoula County stands ready to support work that provides ecosystem benefit and to help broaden the public understanding around how homes ignite and burn. We also stand ready to garner federal funding to help with HIZ work, which ultimately makes doing work on National Forest System lands for ecological restoration easier. In addition, we recognize a need to update the Community Wildfire Protection Plan to better reflect our understanding of the importance of the HIZ.

Moving forward, we request that the Forest Service actively engage Missoula County in efforts and conversations surrounding implementation of the WAM project. Furthermore, we request that the Forest Service include the significance of the HIZ in further community conversations aimed at providing a comprehensive context to wildfire resilient communities. We will be contacting Lolo National Forest Supervisor Carolyn Upton to further discuss and explore these opportunities. We recognize that better adapting our community to live with wildfire may, at times, challenge agency and institutional culture. We are also open to testing our own assumptions and having difficult conversations. In fact, the health of our community demands we engage in this type of courageous dialogue, and we hope you will join us.