

Missoula County Commissioners

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BCC 2022-178
June 7, 2022

U.S. Forest Service
Lolo National Forest, Ninemile Ranger District
Attn: Chris Gauger, Ninemile District Ranger
20325 Remount Road
Huson, MT 59846

RE: Sorrel Springs Hazardous Fuels Reduction Project

Dear Mr. Gauger,

Thank you for the opportunity to comment on the Sorrel Springs Hazardous Fuels Reduction Project. Missoula County continues to be engaged in conversations about reducing our community risk to wildfire. Threats posed by climate change, decades of wildfire suppression and the increased number of homes now located in the Wildland-Urban Interface (WUI) continue to prompt us to adapt and actively increase our resilience to wildfire. In particular, we stress the need for integrating fuel mitigation work within the WUI with attention to the home ignition zone (HIZ) as the most effective way to prevent structure loss during wildfire events.

The scoping letter we received for this proposal focuses on addressing forest health and hazardous fuels reduction, improving resiliency to forest insects and disease and reducing potential wildfire impacts to adjacent private landowners through use of commercial and noncommercial mechanical treatments. While we understand that these treatments will decrease stand densities and improve forest health conditions, we are less convinced that, as currently articulated, the proposed action will achieve the intended risk mitigations for the more than 100 residences you mentioned are within a half-mile of the project area, absent significant HIZ work.

Our understanding of the available science indicates fuel treatments are not sufficient for reducing extreme wildfire risk to communities. Ignition-resistant HIZs and, collectively, ignition-resistant communities are required for extreme wildfires regardless of wildland fuel treatments. Given the described level of wildfire risk in the project area and proximity

to private land and neighborhoods, we were disappointed to see that there was no mention of work or the importance of work within the HIZ.

The HIZ is an essential element of total community wildfire resiliency. Without ignition-resistant structures in the vicinity of the Sorrel Springs area, the fuels treatments work intended to help improve forest health and affect fire behavior will not be nearly, if at all, effective in preventing structure loss. Of course, Missoula County has an important role to play in HIZ work, but we also believe more can be done to recognize and integrate the importance of the HIZ in the Sorrel Springs Hazardous Fuels Reduction Project description and approach.

Taken at face value, the scoping documents might leave some with the impression that proposed fuel treatments will mitigate risk to homes and wildland-urban fire disaster when they will not. This potentially continues the misperception of how structures ignite and burn during extreme wildfires and provides a false sense of security. In reality, the greatest fuel treatment effect on wildfire behavior is *within* the fuel treatment area, so if we're trying to mitigate wildfire impacts to homes, the most impactful fuel treatments will be *within* the HIZ.

If we truly want neighborhoods and communities to be more resilient to wildfire, whether due to extreme events, managed wildfire or prescribed burns, more recognition and education about HIZs is required as part of this project to help change the narrative surrounding fire and living with fire in fire-adapted ecosystems. Promoting ignition-resistant structures linked with fuel mitigation treatments and forest restoration work intended to help improve forest health and affect fire behavior will produce the best results.

We encourage you to further elevate the importance of coordinated interagency support and public engagement efforts aimed at recognizing the significance of the HIZ in reducing risk and preventing structure loss, while at the same time elevating the ecological value of fuel treatments that modify forest structure to the historic range of variability. Strategically engaging the public in what they can do with their homes and properties to mitigate the risk of loss directly benefits private individuals, but it also benefits land managers. Successfully adopting and implementing HIZ measures on a communitywide scale is essential to expanding choices for forest and wildland fire management, such as the potential for increased use of controlled burning in the vicinity of existing homes and neighborhoods, expanding options for how to manage wildfire more safely in the vicinity of homes, and generally improving community resilience in the face of extreme wildfires.

In other words, we need to seize the opportunity associated with projects like the Sorrel Springs Hazardous Fuels Reduction Project to recalibrate the narrative of how we speak about fire on the landscape and help move away from the standard paradigm that frames wildland-urban-fire disasters as a fire-control problem, rather than a primarily home/structure ignition problem principally determined by the HIZ.

Thank you for your work on the Sorrel Springs Hazardous Fuels Reduction Project and your continued work to increase community resiliency in the face of wildfire. As you move ahead, we look forward to working with you to embrace a communitywide approach that incorporates community education, fuel mitigation treatments and ignition-resistant HIZs in more areas in Missoula County. If there is anything further we can do to assist you, please don't hesitate to let us know.

Sincerely,

BOARD OF COUNTY COMMISSIONERS

Juanita Vero, Chair

Josh Slotnick, Commissioner

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