

## Grant Creek Village / 2920 Expo Pkwy Rezoning

Engage Missoula

Public Comment

4.1.22 through 4.12.22

Comment	Date	Name
I definitely know there is a need for more residential dwelling but zoning the entire area does not make sense to me. I would be in favor of a mixed-use approach where residents could live and shop in the same area without having to drive everywhere.	4/1/22	Carol Limahelu
Roger and I have been long term residents of upper Grant Creek since 1987. We raised our 4 daughters here. We bought when land was affordable and we have loved living in Grant Creek. From our first experience with fire in 1988 - on Snowbowl Road, (fire marshals came to the house to give us a heads up that we may need to evacuate quickly if the winds changed) we have been acutely aware of the reality that there is one way in and one way out of Grant Creek. With many other fire seasons since then, and the reality that fires are going to continue to be a threat year 'round, additional building makes no sense in Grant Creek. There is not a summer that goes by that we aren't acutely aware of the fire danger and what would happen if we needed to evacuate. We cannot afford to keep building in Grant Creek if we want to put the safety of residents first. Increased building equals increased traffic. Increased traffic adds to accidents and during an evacuation, when people are afraid and in survival mode, an accident is likely to occur and lives will be at risk - both from fire and from vehicles. Recently, residents of Grant Creek were invited to a meeting to discuss the proposed rezone. Approximately 50 people were in attendance and another 20 on zoom. Unanimously, ALL support the current zoning and reject the rezone. Any property owner/resident in Grant Creek is aware of what would happen if there was a fire and need for evacuation with one way in/one way out. I think that is everyone's MAIN concern - people's safety. In addition to safety, KJA's proposed rezone is not consistent with the original/existing zoning from 1980, which was done in good faith with lots of public input, nor consistent with the '2035 Missoula Growth Plan. There are so many factors that just don't support the rezone. No infrastructure, no parks, no transit, no grocery stores, increased pressure on an already maxed out Hellgate Elementary. On and on... Please consider safety, the additional pollution to the Creek which is already	4/3/22	Dodie Moquin

<p>needing mitigation and all the considerations we have to deny this rezone. Since the City Council rejected this proposal in 2020, none of the problems Grant Creek Residents have with the rezone have been addressed or solved. Nothing has changed. Please vote no to designate zoning to RM-1-45. Vote for safety over density. Thank you! Dodie Moquin</p>		
<p>600 Colorado Gulch Rd. Missoula, MT 59808 April 3, 2022          We write to offer comment for the official record concerning the application for rezoning of land at 2920 Expo Parkway. Over our 43 years as residents of the Grant Creek valley we have witnessed considerable change, much of it positive, but we have serious objections to this rezoning request. "Our Missoula" City Growth Policy provides excellent goals and objectives for positive, sustainable growth of Missoula. We submit that the current zoning at 2920 Expo Parkway provides an opportunity to implement many of them. The application by KJA development does not. It will test which is most important in Missoula – achieving Growth Policy Goals or building densely-packed market-rate apartments that maximize "developer" profits anywhere they choose to build. The proposed rezoning incorporates no mixed-use commercial/residential development that would comprise a "cohesive sustainable neighborhood," no "affordable" housing, no opportunity for home ownership, no access to public parks or public transportation, is distant from shopping, schools and restaurants, forcing residents to rely totally on automobiles to connect to city services, amenities and employment. It's focus is entirely rental apartments, rejecting an opportunity to develop low-cost single family owner-occupied homes, the segment of housing most-needed in Missoula. These parcels could become a proud legacy for Missoula if their development went through the formal subdivision review process where these issues could be addressed and Growth Policy objectives attained. Second, we are very concerned about safety, the focus of Growth Policy Goal SW 10. Our home lies within 300 yards of the two most-recent "Colorado Gulch Fires." Sight of flame and smoke sent many neighbors fleeing. A major wildfire, a not unlikely possibility, would trigger heavy traffic flow out of the valley. The addition of up to 1,500 vehicles in the proposed rezoning/development could severely hinder both evacuation (our ONLY WAY OUT) and entry into the valley by emergency vehicles. Anxious Grant Creek residents caught in town and "looky-lous" would attempt to enter the area, together with emergency vehicles, and traffic flow from Prospect and the proposed 2920 Expo development could prove a disastrous bottleneck above the I-</p>	<p>4/3/22</p>	<p>Barbara &amp; Wendell Beardsley</p>

<p>90/Grant Creek Road intersection. The reconstruction of that intersection last summer is unfortunately adequate only for today's traffic. Before any significant increase in traffic on lower Grant Creek Road is permitted (such as would be generated by this rezoning and development) we must have an alternative second way out of the valley and effective evacuation plans. This was called for in the 1980 Grant Creek Plan 42 years ago, and should be a priority matter for Missoula but has been ignored. . Thank you for your consideration. Wendell and Barbara Beardsley</p>		
<p>We believe that the new zoning change request for 2920 Expo Parkway should be rejected. The original issues with this development --- traffic, egress (one way in and one way out), along with fire concerns --- have not been addressed, much less solved. The huge grass fire in Colorado, near Boulder, last year has impressed upon us that grass fires are equally as dangerous as forest fires. While we appreciate the need for more housing, and more types of housing, in Missoula, we believe that the current proposal is not a good solution. In the event that we needed to evacuate Grant Creek, even a minor accident could prove fatal to the residents of this area and the first responders. The infrastructure is simply not there and will not be for the foreseeable future. Leave the original zoning in place. Frank and Maggie Allen</p>	4/3/22	Frank & Maggie Allen
<p>The landowner built the apartments that were permitted. The zoning change to multi-dwelling does not address concerns I submitted for the earlier expanded version of the land: safety for those above the Lower Grant Creek area, and school designation for Hellgate Elementary and Hellgate Middle School. There are now two people in my household who are bedridden. If a fire occurs, getting out with two people is going to be difficult. How is safety going to be ensured for any of us further up with 700 residences estimated with the zoning change. People have paid additional taxes for the designated schools that are near/over capacity. Where will the new students to the area be sent?</p>	4/4/22	Colleen Hansen
<p>Is the Grant Creek infrastructure prepared to handle a doubling of residential units in the Grant Creek Valley. My understanding is that there are 635 residential units in Grant Creek now. KJA plans to add an additional 700 units. I own, and develop property in the Missoula area and elsewhere. I am generally pro development but this appears to me to be too many units too fast for traffic concerns, fire evacuation safety, schools etc. It was my understanding that the City Council rejected this proposal in 2020 in part because it does</p>	4/6/22	Mark Wilson

<p>not fit the City's Growth Policy. Has the City's growth policy changed substantially since then? Perhaps so in light of the fact that Missoula is now one of the fastest growing cities of its size in America. Let's be smart about this. I am pro growth but not this development. Thank you for your time.</p>		
<p>This proposal for grant creek has already been discussed &amp; voted down. The reason it was voted down was due to lack of access in case of a fire. That has not changed, so I do not understand why this proposal for increased housing is back up for discussion. How many times can Mr Ault go back to the well. We need to keep this proposal at the original 500 units. NOT 700. Thanks you</p>	4/7/22	Kay Langland
<p>It seems only a short time has passed since I last wrote you and the Planning Commission concerning rezoning in the lower Grant Creek in order for Mr. Ault to build an additional 700 units. At that time I wrote a lengthy letter stating my opposition to this project and the rezoning. I will not go over all of my objections; nothing has changed. However, these are my primary concerns: 700 units will double the number of residential units in the Grant Creek Valley. This would make the traffic at the freeway, once again unmanageable. Additionally, my primary concern is fire danger and the ability to get out of this one way canyon in the event of an evacuation. I live further up the creek, and presumably would be one of the last ones to evacuate. With all of the additional people attempting to get out, I foresee a decidedly dangerous situation. The Friends of Grant Creek at a recent meeting stated their position on the new re-zoning. All present agreed with the board, as do I. Thank you for any consideration you can give my concerns.</p>	4/7/22	Sally Tibbs
<p>As a resident of Grant Creek for years I have seen the impact of the current development and continue to have concerns about creating and additional influx of traffic to the Grant Creek corridor. As a daily commuter for work I already am witness to the increased traffic challenges. When taking part in the previous development process which was denied I am not aware of any mitigation the developer has taken to alleviate their projected increased traffic population impact to the area. One of the most alarming situations is the consequences of a wildfire to the region. In addition, I am unaware of any alternative transportation (busses, bikes, etc.) which have been put into place with the current apartments to help offset carbon impacts as well. The closest route for alt transportation from this location is Reserve SB or Reserve to Old Grant Creek, a dangerous road given the number of traffic</p>	4/7/22	Mitchell Lang

<p>accidents. As there has not been adequate mitigation I am against the zoning change. I support the existing zoning as outlined previously. The Lang's 5851 Prospect Drive</p>		
<p>I would just like to express the fact that this rezoning has been settled before. The same issues still exist and there are no quick fixes to make this rezoning possible. We are satisfied with the current zoning and I encourage you leave the zoning as it is.</p>	<p>4/7/22</p>	<p>Robert Johnson</p>
<p>I hope the council will appreciate the cumulative effects of all zoning revisions that increase housing density in the wildland urban interface. The Expo Parkway rezone is a singular proposal, but what prevents future zoning changes that incrementally increase housing density and increase the demands on emergency services agencies to respond to wildfire emergencies in the wildland urban interface? Rezoning decisions must consider the potential for future development that will bring additional impacts to infrastructure (roads, schools, and utilities) and emergency services. An intensive planning process with public input and deliberation created the existing zoning standard. Revising a zoning standard requires a commensurate level of analysis and public involvement. I appreciate the opportunity to respond to the rezoning proposal and offer the following comments. These comments reflect opinions acquired from 40 years' experience in urban and wildland fire. I am a resident of Grant Creek and live in an area that would be affected by this proposal.</p>	<p>4/11/22</p>	<p>Richard Lasko</p>
<p>I am a resident of lower Grant Creek and own a condo in the Cottonwood Condo complex. I understand the need for housing in Missoula, especially affordable housing and housing available to purchase for those Missoulians who can no longer afford a home due to the extremely high costs of available housing in the city. That said, this rezoning proposal does not address the affordable housing situation, nor does it provide an opportunity for homeownership. This rezone will nearly double the current population of Grant Creek and with only one way out, I worry about fire evacuation for the current residents up the creek. Also, the increase in traffic congestion with no public transportation option will increase accidents on Grant Creek Road and pollute Grant Creek as folks sit at the light idling their vehicles. This is especially an issue during ski and tourist season and with the new Bluebird Trail opening up, there will be even more traffic congestion. Finally, I know that the local neighborhood organization, Friends of Grant Creek has tried to negotiate with Mr. Ault in a variety of ways</p>	<p>4/11/22</p>	<p>Erin Nuzzo</p>

<p>to ensure this development is in line with the current look and feel of the neighborhood. I live right next door to this development and I'm worried about Mr. Ault's intent to build 4-story buildings instead of the 3-story buildings that have already been built. The Friends of Grant Creek suggested he build his 4-story complex against the hill on the east side and the opposite side of the Cottonwoods so as to not tower over the our condos and the Rocky Mountain Elk Foundation but for whatever reason, he has refused. Maybe there's a logistical reason for this but he has not shared that with his neighbors. In my opinion, Mr. Ault only cares about making money and doesn't care about being a good neighbor to those of us residents who are already living here. That's his prerogative, of course, as he owns the land, but it's frustrating he doesn't take his neighbors' concerns into account and refuses to work with us so that we can all be happy and openly embrace our new neighbors.</p>		
<p>I am not in favor of this rezoning application for a number of reasons: there is only one road out of Grant Creek Valley and it's already congested; adding so many new homes is a fire hazard; this proposed project is far away from schools, shopping, jobs, buses, churches - same as when rezoning was proposed in 2020; this project does not meet City Zoning Ordinance Zoning Criteria. Code 20.85.040 G; the existing zoning creates opportunities for modest-priced home ownership, in contrast to 700 rental housing units, as proposed by KJA; the infrastructure of the Valley cannot support doubling the number of residential units at this time; and how will rezoning the entire KJA property to RM 1-45 limit the construction to 700 units when legally it allows for 1,100 units? I'm all for new housing because there is a dire need for it, but not on this property. Thank you.</p>	4/11/22	Maureen Smith
<p>With the shortage of owner occupied single family homes in Missoula, I support the current zoning of the property, which includes an area for single family homes to be built next to the existing single family homes in lower Grant Creek. Many friends who are in rental properties, similar to the one that is proposed for the rezone, have seen their monthly rates skyrocket to the point that they are no longer able to continue living in Missoula. Wouldn't it be better to give residents who live here a chance to invest in their own, small but affordable homes, and become a permanent part of our community?</p>	4/11/22	Carol Cady
<p>April 12, 2022 Reference: 2900/2920 Expo Parkway Proposed Rezone EXPO PARKWAY - WILDFIRE LETTER #3 – ORIGINAL SUBMISSION April 12, 2022 KJA Development,</p>	4/12/22	Michael Cole

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](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](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](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

<p>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 /s/ Richard Lasko /s/ John Langstaff Michael Cole, Team Leader Richard Lasko John Langstaff /s/ Tim Hunt /s/ RT Cox Tim Hunt RT Cox</p>		
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