



FEMA

FINDING OF NO SIGNIFICANT IMPACT

City of Ashland Wildfire Mitigation Project
Jackson County, Oregon
PDMC-PJ-10-OR-2018-001

The City of Ashland (City) applied to the Federal Emergency Management Agency (FEMA) through the Oregon Office of Emergency Management (OEM) for a grant under FEMA's Pre-Disaster Mitigation Grant Program (PDM); OEM is the direct recipient for the grant, and the City of Ashland is the subrecipient. The PDM is authorized by Section 203 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act. FEMA's PDM program provides grants to eligible state, territory, and local governments and federally recognized tribes to implement sustained pre-disaster natural hazard mitigation programs.

The purpose of the proposed project is to slow the spread of wildfire within the City of Ashland and reduce the likelihood of wildfire impacts on people and property. The project will implement defensible space and ignition-resistant construction wildfire mitigation measures in the City. Defensible space will be created within 100 feet of participating structures and the work on any particular parcel will be contained within that parcel. The City plans to assist up to 1,100 property owners in the highest wildfire risk areas of the City with the creation of defensible space. The amount of land treated with defensible space prescriptions could range between 198 acres and 1,177 acres, depending on parcel size. The FEMA grant would fund approximately 75 percent of the cost of the proposed action and the remaining 25 percent of costs would come from matching funds contributed by the City (through existing staff time) and project participants (property owners)

Treatments to create defensible space would follow the City's *Defensible Space Treatment Prescription*, typically created in zones (0 to 30 feet and from 30 feet to 100 feet) with progressively less treatment further away from the structure. The City, in coordination with Ashland Fire and Rescue, will document a detailed individual property treatment prescription which includes the following activities as needed for each property:

- Remove standing dead and dying vegetation, except vegetation that is ecologically beneficial and can be safely reserved.
- Remove all bark mulch, stored wood, and dry leaves and needles that have accumulated within five feet of buildings.
- Remove all vegetation (trees and shrubs) listed on the City's Prohibited Flammable Plant List within five feet of buildings or decks (except significant trees).
- Existing trees that are also on the City's Prohibited Flammable Plant List will be maintained so that there is:
 - 10-foot horizontal clearance from any chimney outlet

- 10-foot vertical clearance from the furthest extension of all buildings
- At least 10 feet between the outermost limbs at mature size
- Prune fire-resistant trees to ensure they do not touch any part of a structure including, but not limited to, roofs, eaves, and decks.
- Separate all existing shrubs on the City’s Prohibited Flammable Plant List by a minimum of two times the shrub’s height.
- Remove all shrubs from underneath the drip line of trees.
- Prune tree limbs to create spacing between shrubs and the lowest tree limbs that is at least three-times the height of the shrub.
- Chainsaws, handsaws, and other hand tools would be used to complete the majority of defensible space work.
- Cut material would be chipped and hauled off-site to the Recology transfer station.
- Firewood-size material would be transported to the Jackson County Fuels Committee drop-off site.

Once work is complete, property owners will be execute a maintenance agreement with the City and are expected to maintain the defensible space for a minimum of 20 years after project implementation. Ashland Fire and Rescue will monitor the maintenance of the treated properties in the project area.

The City also proposes to provide financial assistance with replacing wood shake roofs with ignition-resistant roof materials that meets or exceed a Class B requirement on 23 homes. Four of these properties will only require awnings, not the entire roof, to be replaced. The homes include the following:

321 North Main St	349 Cambridge St	701 Oak Knoll Dr
116 Church St	92 Emerick St	611 Beach St
353 Hargadine St	904 Hillview Dr	523 Terrace St
800 Clarence Ln	274 Catalina Dr	1750 Bristol St
165 Meade St	286 Catalina Dr	140 Susan Ln
63 Bush St	1163 Bellview Ave	904 Hillview Dr
400 Clay St	772 Indiana Street	657 Prim St
339 Ridge Rd	730 Oak Knoll Dr	

FINDINGS

FEMA prepared an Environmental Assessment (EA) pursuant to the National Environmental Policy Act (NEPA) of 1969 and FEMA Instruction 108-1-1, *Instruction on Implementation of the Environmental Planning and Historic Preservation Responsibilities and Program Requirements*, to identify and evaluate potential environmental effects resulting from the alternatives presented in the EA and to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI). The EA analyzed the proposed action to reduce wildfire hazards through establishing defensible spaces and retrofitting roofs with ignition resistant material in the treatment areas; and a no action alternative. Other alternative methods to reduce wildfire risks were considered but not carried forward and are described in the EA

The following resources will not be affected by the proposed action either because they do not exist in the project area or the alternatives will have no effect on the resources: geology, farmland soils, wild and scenic rivers, sole source aquifers, coastal resources, and land use and zoning. The proposed action, as described in the EA, will not result in any significant adverse impacts on topography, threatened and endangered species, cultural resources, environmental justice populations, public utilities, and public health and safety.

During implementation of the proposed action, negligible to minor impacts on soils, visual quality and aesthetics, air quality and climate, surface waters and water quality, wetlands, floodplains, vegetation, fish and wildlife, noise, and transportation are anticipated. Additionally, there is a negligible contamination threat from vehicle and equipment use. With implementation of conditions to avoid, minimize, and mitigate impacts as listed in Attachment A, none of these potential effects will be significant. In the long-term, the proposed action will have beneficial effects on several resources from the reduced risk of wildfire damage. FEMA coordinated with the Oregon State Historic Preservation Office (SHPO) and federally recognized Indian tribes with interests in the area to identify potentially affected resources and appropriate measures to avoid and minimize potential impacts.

A public scoping notice was published on July 3, 2020 for a 30-day comment period to notify the public and provide an opportunity to comment on the proposed action, potential alternatives, and preliminary identification of environmental issues. No comments were received. The draft EA was made available to interested parties for a 30-day public comment period from November 3, 2020 through December 4, 2020. No comments were received during the public comment period on the draft EA, therefore it has been finalized. The proposed action is the selected alternative because the no action alternative would not address the purpose and need state in the EA and no other practical alternatives were identified.

CONCLUSION

Based upon the information contained in the PDM grant application, the EA, and conditions in Attachment A of this FONSI, and in accordance with FEMA's FEMA Instruction 108-1-1; Executive Orders (EOs) addressing floodplains (EO 11988), wetlands (EO 11990), and environmental justice (EO 12898); FEMA determined that the proposed action will not have significant impacts on the quality of the natural and human environment. As a result of this FONSI, an EIS will not be prepared and the project; as described in the grant application, the EA, and the conditions in Attachment A; may proceed following grant award.

EHP APPROVAL

Science Kilner
Regional Environmental Officer
FEMA Region 10

Date

EHP ENDORSEMENT

Jackie Pritchett Jr.
Hazard Mitigation Assistance Branch Chief
FEMA Region 10

Date

Attachment A

PERMITTING, PROJECT CONDITIONS, AND MITIGATION MEASURES

The City of Ashland (Subrecipient) will implement the proposed action and comply with the following project conditions and mitigation measures during work and document compliance/presence of the below as applicable on the individual property treatment prescription:

- Any necessary local, state, or federal permits needed to conduct the proposed work will be obtained.
- Work within established Water Resource Protection Zones (WRPZ) will comply with Ashland Municipal Code (AMC) 18.3.11 to protect the following riparian buffers:
 - A 50-foot vegetation buffer along fish-bearing waterways.
 - A 40-foot vegetation buffer along smaller non-fish bearing waterways
 - A 30-foot vegetation buffer along intermittent and ephemeral streams.
- All existing vegetation within the WRPZs will be retained subject to the following exceptions:
 - Removal of Himalayan blackberry (*Rubus armeniacus*) and other flammable noxious weeds with hand-held equipment (weed trimer, loppers, push mowers) may still occur within WRPZ.
 - Fire resistant vegetation that is in contact with structures may be trimmed and maintained to remove the contact.
 - Any vegetation on the Prohibited Flammable Plant List may still be removed at the following extents:
 - 5-foot horizontal clearance of building or decks.
 - 10-foot horizontal clearance from any chimney outlet.
 - 10-foot vertical clearance from the furthest extension of all buildings.
- Within 100 feet of the Ordinary High Water Mark of streams sediment control BMPs will be implemented where ground is disturbed or left exposed after noxious weed removal. Application of loose straw mulch (approximately 50 percent coverage) and native grass seeding will be the minimum acceptable treatment.
- Gas-powered tools will not be used from March 1 to July 15 (fisher denning season) in the Beach Creek drainage to protect Pacific fisher.
- A seasonal vegetation clearing restriction is recommended during the migratory bird nesting season (February 1 through July 31). If the nesting season cannot be avoided, inspect for active nests prior to clearing and coordinate with USFWS regarding permitting for each affected parcel.
- Cut vegetation will be disposed of in an appropriate manner to prevent the spread of invasive species.

- The City will implement the following BMPs pertaining to the use of mechanical equipment and erosion control:
 - Hand tools will be used to implement defensible space and ignition-resistant construction activities; no heavy, tracked equipment will be used.
 - Any spills or leaks from mechanical equipment will be immediately contained and cleaned.
 - The proposed action will conform to the City of Ashland's noise ordinance (9.08.170) and noise-producing equipment use will occur during waking hours (7 a.m. to 10 p.m.).
- To minimize and resolve adverse effects on three *National Register of Historic Places* listed or eligible historic properties, before roof work proceeds, the City must facilitate FEMA's contractor access to the homes to complete additional architectural documentation. Additionally, the City must provide FEMA the proposed roof replacement material before confirming selection with the homeowner for FEMA's review/approval. The City must select suitable replacement roofing that is fire-resistant but also of a style, texture, color, and design that matches the original wood shake roof as closely as possible. Replacement roofing will be selected using the following guidance: the Secretary of Interior's Standards for Treatment of Historic Properties, National Park Service Preservation Brief 4: *Roofing for Historic Buildings* and Preservation Brief 19: *The Repair and Replacement of Historic Wooden Shingle Roofs*; and FEMA P-737, *Home Builder's Guide to Construction in Wildfire Zones*, Fact Sheets 5 and 7. Coordination can be done with science.kilner@fema.dhs.gov and this applies to the following properties:
 - 321 North Main Street
 - 63 Bush Street in Ashland
 - 116 Church Street