U.S. Department of Homeland Security
Region X
130 228th Street SW
Bothell, WA 98021-9796

FEMA

FINDING OF NO SIGNIFICANT IMPACT

Forest Park Wildfire Mitigation
City of Portland
Hazard Mitigation Grant Program 5195-17R

The City of Portland applied to the Federal Emergency Management Agency (FEMA) through the Oregon Office of Emergency Management (OEM) for a grant under FEMA's Hazard Mitigation Grant Program (HMGP) for a wildfire fuels reduction mitigation project. The HMGP is authorized under Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 (Public Law 93-288, as amended, 42 U.S. Code § 5121-5207) and funds for this project were made available following 2017 and 2018 wildfires in Oregon that received FEMA Fire Management Assistance Grants.

The purpose of the proposed project is to reduce wildfire hazards in the City's Forest Park and adjacent areas consistent with the *Forest Park Natural Resource Management Plan* (1995) [NRMP], *Forest Park Wildfire Risk Reduction Final Report* (2008), *Mitigation Action Plan* (2016), and Multnomah County's *Wildland Protection Plan* (2011) [WPP]. The proposed project would allow Portland Fire & Rescue (PF&R) and Portland Parks & Recreation (PP&R) to significantly reduce fuel loads in a critical 500 acre target area of Forest Park and establish conditions that can more easily and affordably be maintained in perpetuity. By removing ground and ladder fuels, the likelihood of a wildfire rapidly spreading throughout the park and surrounding Linnton community will be reduced. The proposed project, along with ongoing and prior work, will help improve overall forest health and leave the park less vulnerable to wildfires and pose a lower risk to nearby residences, businesses, and critical infrastructure in Linnton.

There is also outreach and education as part of the proposed project, intended to promote defensible space measures on private property near the Park, which would lessen the need for disaster assistance for losses and damages to the built environment in the WUI.

PP&R would contract with professional forest management crews to reduce hazardous fuel loads and invasive vegetation surrounding the Linnton neighborhoods. Crews would be State licensed herbicide applicators, would be supervised by PP&R staff, and work will be done in accordance with PP&R's Integrated Pest Management Program (*2019*) program. Invasive vines and weedy trees are scattered throughout the treatment area. Work would be completed over a two-year period. Following the invasive plant removal work, contractors, staff, and volunteer crews would replant sites native species of shrubs and ground covers, preventing erosion and restoring healthier conditions. Using the Portland Plant Lit (2016) and in consultation with the Oregon Department of Forestry (ODF), plant species will be chosen that promote long-term fire resilience and minimize hazardous fuels.

The following vegetation management and disposal methods will be used:

- The work will be conducted with ground crews using manual, mechanical, and chemical methods to reduce hazardous fuel loads and invasive vegetation.
- Ground crews would move through the forest using hand-held equipment to cut or apply herbicide to invasive trees, shrubs, ground cover and vines.
- Selective pruning to reduce fuel sources and ladder fuels in strategic locations would occur.
- Following the invasive plant removal work, replanting with low-growing native species of shrubs and ground covers will occur using a bareroot planting method.
- Straw mulch may be applied as necessary to maintain surface sediment filtration in areas where invasive plants have been manually removed and soil exposed.
- There will be no staging of equipment off improved surfaces within the project area. Any chipping would occur in an established disturbance area, such as an existing access road.

Longer-term maintenance would be required for 20 years to ensure the effectiveness of fuels reduction treatments in the project area. Maintenance is scheduled on an annual basis, during adaptive management monitoring sessions which occur in the early spring and summer. Treatments include herbicide application, mechanical cutting, and manual labor to control vegetative ladder and ground fuels. Thus, PP&R would conduct treatment in the target area annually per a required maintenance agreement.

FINDINGS

FEMA prepared a Supplemental Environmental Assessment (SEA) 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 SEA and to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI). The SEA supplements an Environmental Assessment (EA) FEMA completed in 2006 for a similar project in Forest Park which was funded with FEMA Pre-Disaster Mitigation Grant Program funds (PDMC-PJ-10-OR2005-005). The SEA analyzed the proposed action to reduce wildfire hazards through fuels reduction in the treatment area and a no action alternative. Other alternative methods to reduce wildfire risks were considered but not carried forward and are described in the SEA.

The following resources will not be affected by the proposed action either because they do not exist in the project area or the alternatives would have no effect on the resources: geology, wild and scenic rivers, sole source aquifers, coastal resources, land use and zoning, public utilities, and transportation.

During implementation of the proposed action, negligible to minor impacts on soils including farmland soils, air quality and climate, visual quality and aesthetics, water resources and

wetlands, floodplains, vegetation, fish and wildlife, cultural and historic resources, environmental justice, hazardous materials, noise, and public health and safety are anticipated. With implementation of conditions to avoid, minimize, and mitigate impacts as listed in Attachment A, none of these potential impacts 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 consulted with the State Historic Preservation Officer (SHPO) and federally recognized Tribes with interests in the area to identify potentially affected resources and appropriate measures to avoid and minimize potential impacts. The Draft SEA was made available to the public and interested parties for a 30-day public comment period. No comments were received. The proposed action is the selected alternative because the no action alternative would not address the purpose and need statement in the SEA and no other practical alternatives were identified.

CONCLUSION

Based upon the information contained in the HMGP grant application, the SEA, and conditions in Attachment A of this FONSI; and in accordance with 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 SEA, and the conditions in Attachment A; may proceed.

EHP APPROVAL

SCIENCE A KILNER

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Science Kilner — Date
Regional Environmental Officer
FEMA Region 10

EHP ENDORSEMENT

JACKIE D PRITCHETT JR

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

Attachment A

PERMITTING, PROJECT CONDITIONS, AND MITIGATION MEASURES

Portland Parks & Recreation (subrecipient) shall comply with the following project conditions and mitigation measures in implementing the proposed action; and implement best management practices (BMPs) where possible.

- Any necessary local, state, or federal licenses and permits needed to conduct the proposed work will be obtained before work.

- The following measures will be implemented with regard to Air Quality and Climate:
  - Hand tools will be used to implement defensible space and hazardous fuels reduction treatments.
  - Vehicles and equipment running times will be kept to the minimum extent possible.
  - No burning will be conducted to dispose of detritus.
  - Small-scale, localized, hand-applied herbicide methods will be used.

- The following measures will be incorporated into herbicide use to avoid and minimize potential harm to Surface Waters, Water Quality, and Wetlands:
  - For broadcast spraying, the exclusion zone will be 100-feet from the Ordinary High-Water Mark (OHWM) on wetted channels and 50-feet on dry channels. When applying to tall vegetation keep nozzle within 6-feet of the ground.
  - To allow additional fuels reduction, limited herbicide application (spot spraying) will be allowed up to 25-feet from the OHWM.
  - Within 25-feet of OHWM, only manual removal of invasive vegetation (hand tools, chainsaws, weedwhackers) and direct application (e.g., wicking, cut stump) may be used.
    - Implement conditions described on page 46 of the Integrated Pest Management Program: "*The buffer zone referred to in this policy is defined as a corridor of land that is 25 feet in width on the sides of a stream or other body of water. Measurement of this buffer zone begins at the edge of the water line at the time of application."*
    - Hand selective direct application methods (dabbing, wicking, stem injection, cut-stump treatment, etc.) may be done up to the top of the bank.

- The following measures will be implemented to mitigate impacts to Vegetation:
  - Implement conditions described in the Portland Integrated Pest Management Program (*2019*) for herbicide best management practices.
  - Select species in the Portland Plant List (*2016*) document for reestablishment of native vegetation.

- The following measures will be incorporated to avoid and minimize potential harm to Fish and Wildlife, Migratory Birds, and to Threatened & Endangered Species Act-listed species and habitats:
  - Adhere to "Protecting Nesting Birds" Best Management Practices for Vegetation and Construction Projects if nesting season (January 1 to August 31) cannot be avoided. Secure appropriate permitting from the US Fish and Wildlife Service before work to mitigate impacts to migratory birds.
  - Cover disturbed areas (hand pulling) with straw mulch until native plantings are established.
  - Herbicide Application: Implement herbicide BMPs, including setting sprayers to coarse droplets (400mm) and maintain a no spray buffers around OHWM of all streams (perennial and intermittent) as describe above.

- The following measures will be implemented to mitigate and limit potenetial impacts from Hazardous Materials (primarily vehicle and equipment use):
  - Equipment will be kept in good condition.
  - Any spills or leaks from equipment would be contained and cleaned up right away.
  - All equipment and project activities would adhere to City of Portland IMP Policy 12 to reduce the risk of hazardous leaks and spills.

- In order to limit impacts from the minor, temporary increase in Noise within the project area and the immediate vicinity of the work, noise-producing equipment use would occur during less-sensitive, waking hours (7 a.m. to 10 p.m.).

- In the event that any archaeological resources are discovered during project implementation, work would immediately cease, the area would be secured, and Portland Parks and Recreation will notify the State Historic Preservation Officer and FEMA for further evaluation.

- This review does not address all Federal, State, and local requirements. Acceptance of Federal funding requires recipient to comply with all Federal, State, and local laws. Failure to obtain all appropriate Federal, State, and local environmental permits and clearances may jeopardize Federal funding.