SEPA Nonproject Review Form

PART I - FRAMEWORK

1) Background

a) Name of proposal, if any, and brief description.

Japanese beetle (*Popillia japonica* Newman, 1841) Eradication program in Washington State.

The Washington State Department of Agriculture's (WSDA) Pest Program conducts yearly statewide trapping surveys for Japanese beetle (JB). Historically, a majority of JB detections have been around SeaTac International Airport, Boeing Field and Spokane International Airport, where JB have "hitch-hiked" on cargo aircraft from the Midwest and East Coast of the United States. In 2020, however, multiple specimens were detected in Yakima Counties lower valley during WSDA's JB trapping survey. Delimiting trapping uncovered a large JB infestation in Grandview and the surrounding areas of Yakima and Benton Counties. Eradication activities began in the spring of 2022. Given the increasing threat of JB in Washington State, a strategy of eradication is needed if further infestations are discovered.

b) Agency and contact name, address, telephone, fax, email

Camilo Acosta
Japanese Beetle Eradication Coordinator
Washington State Department of Agriculture
21 N 1st Ave Suite 103 Yakima, WA 98902
1-800-443-6684
cacosta@agr.wa.gov

c) If the agency and contact persons have separate addresses and phone numbers, it is useful to provide both.

Rian Wojahn
State Eradication Coordinator
Washington State Department of Agriculture
3939 Cleveland Ave SE Olympia, WA 98501
1-800-443-6684
rwojahn@agr.wa.gov

d) Designated responsible official

Kelly McLain | SEPA LEAD

Washington State Department of Agriculture
kmclain@agr.wa.gov

e) Describe the planning process schedule/timeline

A determination of impact will be made in June 2022. This will be followed by a fourteen (14) day comment period for the public to submit comments on the proposal. If allowed, the proposal will proceed.

f) Location - Describe the jurisdiction or area where the proposal is applicable. (Attach a map(s) if appropriate)

Japanese beetle has the capability of flight, and although it is a clumsy flyer, it can sustain flight for an average of five miles, even greater in the right conditions. Japanese beetle also frequently “hitch-hike” on aircraft and interstate vehicles, further increasing their dispersal capabilities. Japanese beetle spends the majority of its life cycle in the soil as a larvae (grub). This leads to grubs being found in potted plants, sod, and other articles that are commonly transported across state and international borders. Grubs cause extensive damage to turf areas through aggressive feeding on the roots, often resulting in large brown patches to appear on the turf’s surface. Given that infestation locations are unknown, the proposed eradication area is considered “state-wide.”

g) What is the legal authority for the proposal?

Revised Code of Washington (RCW) Chapter 17.24.101 Statewide Survey and Control Activity.

If there is reason to believe that a plant or bee pest may adversely impact the forestry, agricultural, horticultural, floricultural, or related industries of the state; or may cause harm to the environment of the state; or such information is needed to facilitate or allow the movement of forestry, agricultural, horticultural, or related products to out-of-state, foreign and domestic markets, the director may conduct, or cause to be conducted, surveys to determine the presence, absence, or distribution of a pest.

The director may take such measures as may be required to control or eradicate such pests where such measures are determined to be in the public interest, are technically feasible, and for which funds are appropriated or provided through cooperative agreements.

h) Identify any other future nonproject actions believed necessary to achieve the objectives of this action.

Existing quarantine boundaries may need to be revised. Revisions would be based off Japanese beetle detections and best available science. Quarantine actions are allowed under RCW 17.24.041. Current Japanese beetle quarantine rules are found under Chapter 16-470 WAC QUARINTINE-AGRICULTURAL PESTS.

If needed, the Director of Agriculture may ask the Governor for an emergency declaration under RCW 17.24.171.

2) Need and Objectives

a) Describe the need for the action. (Whenever possible this should identify the broad or fundamental problem or opportunity that is to be addressed, rather than a legislative or other directive.)

Immediate action is needed to prevent Japanese beetle from becoming established in Washington State. Japanese beetle is native to east Asia and was first introduced to the United States in 1916. Since its introduction, it has become established in most states east of the Mississippi river and causes millions of dollars of damage to crops and other plants annually. Adult Japanese beetles defoliate the leaves of over 300 species of plants including economically important apples, grapes, hops and corn. Japanese beetle larvae cause extensive damage to turf areas through aggressive feeding on the roots. If allowed to establish in Washington, it would pose a significant threat to our economy and natural resources.

b) Describe the objective(s) of the proposal, including any secondary objectives which may be used to shape or choose among alternatives.

The objective of this proposal is eradication of Japanese beetle from Washington State. Additionally, it will help ensure Washington State remains a Category 1 (Protected) state.

Category 1 - Uninfested/Quarantine Pest

- Japanese beetle is not known to be established in the state based on official surveys (See Appendix 4), **and**
- There is risk of entry via artificial means, natural spread from an infested area is not imminent nor likely, **and**
- State has conducted a pest risk assessment and found the expected pest impact to be moderate to high, **and**
- Pest impact can only be mitigated to an acceptable level by applying quarantine certification protocols, **and**
- State has officially adopted and maintains a quarantine to prevent the entry of Japanese beetle and state has active eradication program in place for any incipient populations.

-See the U.S. Domestic Japanese beetle Harmonization Plan for more on Category 1 status https://www.nationalplantboard.org/japanese-beetle-harmonization-plan.html

c) Identify any assumptions or constraints, including legal mandates, which limit the approach or strategy to be taken in pursuing the objective(s).

Multiple years of funding from the state legislature would be required to eradicate an infestation of Japanese beetle. Therefore, activities in this proposal are dependent on available funding.

Permission to access and treat private property and businesses is imperative to the success of this proposal. Treatments of these key areas will not happen without prior consent. Cooperation from the public is needed to ensure complete eradication of Japanese beetle from Washington State. To ensure these steps are taken, WSDA has developed detailed paper and electronic treatment consent forms that can be delivered to stakeholders in a variety of ways. These forms are versatile, and can be adapted to work in any location, language or special treatment area.

d) If there is no legislative or other mandate that requires a particular approach, describe what approaches could reasonably achieve the objective(s).

As referenced in section 1.g above, the Washington State Legislature has granted WSDA eradication authority. Furthermore, WSDA has been authorized through RCW 17.24.041 to take quarantine actions. In addition to these methods, WSDA has commenced an outreach campaign regarding Japanese beetle proposal activities.

3) Environmental Overview

Describe in broad terms how achieving the objective(s) would direct or encourage physical changes to the environment. Include the type and degree of likely changes such as the likely changes in development and/or infrastructure, or changes to how an area will be managed.

Eradication of Japanese beetle will ensure Washington State retains its highly productive agricultural industry as well as its international and interstate trade of this industry's products. Furthermore, the state's environment, natural resources, and natural beauty will be preserved through the eradication of this pest.

4) Regulatory Framework

a) Describe the existing regulatory/planning framework as it may influence or direct the proposal.

Proposal activities would include the use of pesticides and bio-insecticides to treat vegetation and soil containing vegetation. As a result, WSDA will need to address environmental regulations and critical areas.

Proposal activities could also include the revision of existing quarantine boundaries, which would occur under Chapter 16-470 WAC.

b) Identify any potential impacts from the proposal that have been previously designated as acceptable under the Growth Management Act (GMA), chapter 36.70A RCW.

Does not apply

5) Related Documentation

a) Briefly describe any existing regulation, policy or plan that is expected to be replaced or amended as a result of the proposal. (Adequate descriptions in section 4.a may be referenced here, rather than repeated.)

Possible amended policies are described in section 4.a.

b) List any environmental documents (SEPA or NEPA) that have been prepared for items listed in 4.a. or that provide analysis relevant to this proposal. **Note:** Impacts with previous adequate analysis need not be re-analyzed, but should be adopted or incorporated by reference into the NPRF. Identify the:

A project SEPA checklist for the Grandview Japanese beetle eradication was prepared for activities related to those in section 4.a.

i. Project SEPA checklist
ii. Washington State Department of Agriculture, document prepared on April 4, 2022, DNS made on April 12, 2022.
iii. Copies can be obtained by visiting https://agr.wa.gov/departments/insects-pests-and-weeds/insects/japanese-beetle/control-efforts or emailing cacosta@agr.wa.gov
iv. The project SEPA document, as a whole, is relevant to the current proposal as it details the control methods being used to eradicate Japanese beetle in Grandview, WA. These methods are similar to what would be used in this proposal, most notably the chemical controls detailed in section A.11 of the project SEPA.

c) List other relevant environmental documents/studies/models which have been identified as necessary to support decision making for this proposal.

Since its introduction in 1916 and consequent spread across the eastern US ,extensive research has been done on Japanese beetle and the damage they do to chosen food plants, pesticide efficacy for control, and dispersal capabilities.

The U.S. Domestic Japanese Beetle Harmonization Plan also contains information related to this proposal.

6) Public Involvement (Optional)

WSDA has implemented a statewide Japanese beetle public outreach campaign. Components of this campaign have included: press releases,presentations, distributing outreach materials, tabling at public events, and a dedicated Japanese beetle page on the WSDA website.

a) Identify agencies with jurisdiction or expertise, affected tribes, and other known stakeholder groups whose input is likely to be specifically solicited in the development of this proposal.

WSDA will work with agencies, municipalities, tribal nations and any other stakeholder group(s) once an infestation has been uncovered and eradication is needed.

b) Briefly describe the processes used or expected to be used for soliciting input from those listed. [Examples: ad hoc committees, tribal consultations, interagency meetings, public workshops or hearings, newsletters, etc.]

Interagency meetings, tribal consultations, stakeholder updates and public outreach will all be used to gain information/input if an eradication project is needed.

PART II – IMPACT ANALYSIS AND ALTERNATIVES

7) Affected Environment

Generally describe the existing environmental landscapes or elements (e.g., character and quality of ecosystem, existing trends, infrastructure, service levels, etc.) likely to be affected if the proposal is implemented. Include a description of the existing built and natural environment where future "on the ground" activities would occur that would be influenced by the nonproject proposal.

Note: When complete, this section needs to provide information on existing conditions for the elements of the environment discussed in sections 8 and 9. A list of the built and natural elements of the environment is in WAC 197-11-444, and is included at the end of this form.

Japanese beetle is highly mobile (through organic and inorganic methods) and adaptable; therefore, eradication could take place across a wide variety of landscapes throughout Washington State. Generally, infestations could take place where preferred host plants are available and abundant. This will likely coincide with turf areas where eggs can be laid and larvae will have food for their development. Areas that match these conditions are numerous and diverse. Any area where Japanese beetle needs to be eradicated will present new challenges and environmental conditions cannot be predicted.

8) Key Issue Assessment

List the identified key issues or areas of controversy or concern and include a brief statement of why each is a key issue. For each item listed:

a) Identify alternative options or solutions for the objective or concern.

Currently, no alternative options exist. Japanese beetle populations must be found and eradicated. Japanese beetle can disperse through flight, on aircraft, transport in nursery items and on interstate cargo vehicles. Female Japanese beetle can lay 40-60 eggs per season.

b) Describe the environmental considerations/impacts relevant to each of the alternatives identified in 8.a.

No alternatives identified.

c) Describe reasonable mitigation measures for the adverse impacts identified

No alternatives identified.

d) Identify those alternatives to be carried forward for further analysis.

If alternative eradication methods are developed, WSDA will analyze those methods. Best available science will be used during all eradication activities.

e) Briefly describe why those alternatives rejected from further consideration were not carried forward.

Currently, no alternative options have been identified.

9) Proposed Nonproject Action or Alternative Actions

Describe a range of reasonable alternatives or the preferred alternative that will meet the objective(s). For each alternative, answer the following questions, referring again to the list of the elements of the environment in WAC 197-11-444:

No action is the only alternative to eradication. Proposed activities including trapping surveys, possible quarantine revisions, chemical control tactics, and public outreach will be needed to completely eradicate Japanese beetle from Washington State. The no action alternative would be devastating to the economy and environment of Washington State, and is therefore, not being considered.

a) If this alternative were fully implemented (including full build-out development, redevelopment, changes in land use, density of uses, management practices, etc.), describe where and how it would direct or encourage demand on or changes within elements of the human or built environment, as well as the likely affects on the natural environment. Identify where the change or affect or increased demand constitutes a likely adverse impact, and describe any further or additional adverse impacts that are likely to occur as a result of those changes and affects.

This section does not apply.

b) Identify potential mitigation measures for the adverse impacts identified in 9.a and describe how effective the mitigation is assumed to be, any adverse impacts that could result from the use of the mitigation, and any conflict or concern related to the proposal objectives and/or key issues identified.

This section does not apply.

c) Identify unavoidable impacts and those that will be left to be addressed at the project level.

Unavoidable impacts include use of pesticide(s) at the eradication site(s). Since the site(s) are currently unknown, it is also unknown what the surrounding environment will look like. Other potential impacts will be evaluated during the eradication planning stage.

d) Describe how the proposal objectives will or will not be met if the impacts described in 9.c were to occur.

In order to eradicate Japanese beetle, impacts listed in 9.c may be needed. Without these impacts Japanese beetle would be free to reproduce, disperse and become established across Washington State.

Note: Alternatives may be rejected at any point in the process if: they have no environmental benefit, are not within existing authority, are determined unfeasible, or do not meet the core objectives.

PART III – IMPLEMENTATION CONSIDERATIONS

10) Consistency of the proposal with other plans, policies and laws.

a) Internal consistency - If there are internal inconsistencies between this proposal and your agency's previously adopted or ongoing plans and regulations, identify any strategies or ideas for resolving these inconsistencies.

None

b) External consistency - If there are external inconsistencies between this proposal and adopted or ongoing plans and regulations of adjacent jurisdictions and/or other agencies, identify any strategies or ideas for resolving these inconsistencies.

None

11) Monitoring and Follow-up

a) Describe any monitoring that will occur to ensure the impacts were as predicted and that mitigation is effective, including responsible party, timing, and method(s) to be used.

Areas in and around Japanese beetle detections will be trapped by WSDA in accordance with guidelines set in the U.S. Domestic Japanese Beetle Harmonization Plan. Once an area has zero detections, it will be trapped for an additional three years. An additional three years with zero detections will result in that area being considered pest-free.

b) Identify any plans or strategies for updating this proposed action based on deviation from impact projections or other criteria.

This proposal may be updated if new eradication or trapping techniques are developed and adopted by WSDA.

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WAC 197-11-444, Elements of the Environment

Natural Environment

a. Earth

Japanese beetle lay eggs in the soil, with their larvae developing underground for much of the year. Soils, topography, unique physical features and erosion of an infested area will be considered during the eradication planning phase as chemical control is a component of this project.

b. Air

The presence of Japanese beetle, as well as eradication activities will not affect air quality.

c. Water

Presence of Japanese has no affect on the water of Washington State. Pesticide(s) will need to be addressed before eradication activities.

d. Plants and animals

Japanese beetle is an invasive pest of 300 different species of plant. Eradication of Japanese beetle from Washington State will allow ornamental plants and native forests to continue to thrive. Thriving plant life and forests will benefit pollinators and wildlife that are dependent on those resources.

e. Energy and natural resources

Does not apply

Built Environment

a. Environmental health

Pesticide(s) will be used during Japanese beetle eradication. WSDA Pesticide Management division will work closely with eradication personnel to ensure label requirements are being followed and that public health concerns are being mitigated.

Minimal, short term noise may be produced from equipment used during eradication activities.

b. Land and shoreline use

None

c. Transportation

Depending on the eradication location, walkways and/or streets may need to be temporarily closed for treatment.

d. Public services and utilities

To ensure requirements are met, WSDA will work with state and local government, school districts, parks and recreation departments, and any other entity which could be effected by eradication activities.