

# **SEPA ENVIRONMENTAL CHECKLIST**

## **A. Background**

### **1. Name of proposed project, if applicable:**

2024 Spongy Moth Eradication Project – Concrete  
Concrete, Skagit County, Washington State

### **2. Name of applicant:**

Washington State Department of Agriculture

### **3. Address and phone number of applicant and contact person:**

Rian Wojahn  
7321 Linderson Way Southwest, Suite 102  
Tumwater, Washington state 98501  
1-800-443-6844

### **4. Date checklist prepared:**

January 27, 2024

### **5. Agency requesting checklist:**

Washington State Department of Agriculture

### **6. Proposed timing or schedule (including phasing, if applicable):**

Proposed aerial applications would take place between mid-April and late-June 2024.

### **7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

Yes, success of the proposal will be determined by WSDA's summer spongy moth trapping program. Spongy moth pheromone traps will be installed in high-density and monitored during the summers of 2024, 2025 and 2026.

### **8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

United States Department of Agriculture-Animal and Plant Health Inspection Service (USDA-APHIS) will prepare an environmental assessment (EA) which will be tiered to the 1995 Final Environmental Impact Statement (FEIS) prepared by USDA-Forest Service and USDA-APHIS entitled "Gypsy Moth

Management in the United States: a cooperative approach”, and a 2012 Final Supplemental Environmental Impact Statement (FSEIS) to the 1995 FEIS. Relevant sections of the FEIS and FSEIS will be incorporated herein by reference. A copy of the of the EA will be available at selected Thurston County Libraries and WSDA website.

As required by the Endangered Species Act Section 7, USDA-APHIS will be consulting with United States Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) regarding the need for a Biological Assessment (BA).

**9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

The Aquatic and Invasive Species Control Permit application referenced in question 10 below is pending issuance by Department of Ecology.

**10. List any government approvals or permits that will be needed for your proposal, if known.**

The above mentioned Environmental Assessment (EA) which will be tiered to the FEIS and SEIS.

WSDA will work with county and local government to ensure compliance with all applicable local ordinances.

WSDA will consult with other agencies in order to implement appropriate mitigating measures with regard to threatened or endangered species and high quality ecosystems. Endangered Species Act Section 7 consultations are also being conducted by the USDA-APHIS.

The proposed project will be conducted under a National Pollution Discharge Elimination System (NPDES) permit titled “Aquatic and Invasive Species Control General Permit” issued to WSDA by Department of Ecology.

**Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)**

The WSDA proposes to eradicate an infestation of spongy moth, *Lymantria dispar* (Linnaeus), in Concrete, Skagit County, Washington State by taking the following action:

Three to five aerial applications of the biological insecticide *Bacillus thuringiensis* var. *kurstaki* (Btk) (Foray® 48B, EPA Reg. No. 73049-427) will be applied, at label rate, to all foliage within an area 920.0 acres in size. Exact timing of applications will depend on larva and foliage development, along with weather conditions. The proposed project would likely begin around early-mid May 2024.

**11. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section,**

township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The proposal is located on the east side of Lake Shannon, north of Concrete, Skagit County, Washington State. The Lower Baker Dam is located near the southwest boundary. Baker River Rd. is the major road running into the site

Township 35-0N Range 8-0E Section 01 and 02  
Township 36-0N Range 8-0E Sections 35 and 36

See attached map for further details

## B. Environmental Elements

### 1. Earth

#### a. General description of the site:

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

#### b. What is the steepest slope on the site (approximate percent slope)?

30 percent

#### c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Not Applicable

#### d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Not Applicable

#### e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Not Applicable

#### f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

Not Applicable

#### g. About what percent of the site will be covered with impervious surfaces after project

**construction (for example, asphalt or buildings)?**

Not Applicable

**h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.**

Not Applicable

## **2. Air**

**a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.**

A fixed-wing airplane will be used to apply *Bacillus thuringiensis* var. *kurstaki* (Btk) 150-200 feet above the treetops. Btk droplet size will be minimal (100-150 microns) and only remain suspended in the air for a very short amount of time.

**b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

No

**c. Proposed measures to reduce or control emissions or other impacts to air, if any.**

Proposed treatments will only take place when weather conditions (temperature, humidity and wind) do not promote prolonged droplet suspension.

## **3. Water**

**a. Surface Water:**

**1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

Everett Lake and its associated freshwater forested/shrub wetlands is located on the southern boundary of the site. Lake Shannon, which is a reservoir of the Lower Baker Dam, is located along the western boundary of the site.

**2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

Yes, vegetation overhanging surface water may need to be treated. WSDA will work under an NPDES permit title "Aquatic and Invasive Species Control General Permit" issued by the Department of Ecology. The permit covers management activities that result in the direct or indirect discharge of pesticides or control products into surface waters of the state of Washington.

The permit and fact sheet may be viewed on Ecology's website at <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Aquatic-pesticide-permits/aquatic-invasive-species-control-general-permit> WSDA and its contractor for this proposal will comply with all terms and conditions required by the NPDES permit.

3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

Not Applicable

4. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.

No

5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

Not Applicable

6. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No waste discharge is expected to occur.

#### **b. Ground Water:**

1. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.

No

2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Not Applicable

#### **c. Water Runoff (including stormwater):**

- a) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

A majority of the proposed project is forested. Water runoff is captured in Lake Shannon, which is a

reservoir of the Lower Baker Dam. A small amount of runoff in the southwest corner of the site flows into the Concrete wastewater treatment plant.

**b) Could waste materials enter ground or surface waters? If so, generally describe.**

Possibly, but not likely. The proposed project is not expected to generate any waste material.

**c) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

No

**d) Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any.**

Due to the timing of applications and precision of aerial application equipment, it is unlikely that material would enter the water system. To maximize product efficacy and to minimize potential runoff, no Btk applications will be conducted when it is raining or when rain is in the immediate forecast.

#### 4. Plants

**a. Check the types of vegetation found on the site:**

- ☒ deciduous tree: alder, maple, aspen, other
- ☒ evergreen tree: fir, cedar, pine, other
- ☒ shrubs
- ☒ grass
- ☐ pasture
- ☐ crop or grain
- ☐ orchards, vineyards, or other permanent crops.
- ☒ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- ☒ water plants: water lily, eelgrass, milfoil, other
- ☐ other types of vegetation

**b. What kind and amount of vegetation will be removed or altered?**

The proposal will not remove or alter vegetation.

**c. List threatened and endangered species known to be on or near the site.**

A search of Department of Natural Resources (DNR) Natural Heritage Database found no threatened or endangered species.

**d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.**

In the caterpillar life stage, spongy moth feed on over 300 different species of trees and shrubs. Eradicating spongy moth from Concrete will help with the preservation and enhancement of the

forestlands on the site. Furthermore, it will help in stopping infestations throughout other areas of Washington State.

**e. List all noxious weeds and invasive species known to be on or near the site.**

Not Applicable

## 5. Animals

**a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.**

Examples include:

- **Birds:** hawk, heron, eagle, songbirds, **other:** Northern spotted owl, Golden eagle, Townsend's Big-eared bat
- **Mammals:** deer, bear, elk, beaver, **other:**
- **Fish:** bass, salmon, trout, herring, shellfish, **other:** Cutthroat trout, Rainbow trout, Dolly Varden/Bull trout, Coho salmon, Sockeye salmon, Steelhead trout, Kokanee salmon, and Pink salmon (odd year)

**b. List any threatened and endangered species known to be on or near the site.**

Northern spotted owl has been observed outside the site boundaries, however, the last listed state observance was in 2004. Northern spotted owl is a federally threatened species and state endangered species.

**c. Is the site part of a migration route? If so, explain.**

Yes, the site lies within the Pacific Flyway.

**d. Proposed measures to preserve or enhance wildlife, if any.**

The proposed project to eradicate the spongy moth infestation will preserve native plants, landscaping and other vegetation, thereby protecting habitat for fish and wildlife.

**e. List any invasive animal species known to be on or near the site.**

Not Applicable

## 6. Energy and Natural Resources

**1. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

Not Applicable

**2. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

No

- 3. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.**

Not applicable

## **7. Environmental Health**

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.**

Yes, exposure to the insecticide Btk during mixing and application, and some potential for spills. The potential for health hazards associated with this project are addressed in the SEIS referred to in Section A, item #8 of this SEPA checklist. According to the FEIS and SEIS, there is minimal potential for significant adverse impacts on human health in projects of this type. It is the intent of WSDA to reduce that minimal potential through compliance with the label, and actions detailed in question #5 below.

- 1. Describe any known or possible contamination at the site from present or past uses.**

Not Applicable

- 2. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

Not Applicable

- 3. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

An insecticide will be during the operational time period and will be stored offsite.

- 4. Describe special emergency services that might be required.**

In the event of a major spill, the Department of Ecology "Spill Response Team" may be required.

- 5. Proposed measures to reduce or control environmental health hazards, if any.**

All proposed project activities will be done in accordance with the insecticide label. A WSDA, USDA-FS or USDA-APHIS representative will be present during loading and application of the insecticide and will monitor compliance with treatment specifications. Containment and clean-up materials will be on-site during applications. Interested stakeholders will be supplied with information about the insecticide to be applied. Stakeholders will also be given the opportunity to be placed on a call-ahead list (robocalls, text message, and email) and notified



of dates and times of activity along with measures they may wish to take to protect themselves and their property. WSDA will work with daycares and the schools in the proposed project area to ensure safety of all children.

#### **b. Noise**

- 1. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

Not Applicable

- 2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

Operations of the proposed project would be conducted by a fixed-wing aircraft. Short-term noise would be produced during daylight hours at variable times.

- 3. Proposed measures to reduce or control noise impacts, if any.**

Operations would take place during times that are least likely to affect residents.

#### **8. Land and Shoreline Use**

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

Forestland, small day-use park and Puget Sound Energy (PSE) operations. A few residential properties are located in the southeast area of the site.

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

Not Applicable

- 1. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

Not Applicable

- c. Describe any structures on the site.**

Housing, commercial equipment facilities

- d. Will any structures be demolished? If so, what?**

No

**e. What is the current zoning classification of the site?**

- Industrial Forest-Natural Resource Lands (IF-NRL)
- Secondary Forest-Natural Resource Lands (SF-NRL)
- Mineral Resource Overlay (MRO)

**f. What is the current comprehensive plan designation of the site?**

Not Applicable

**g. If applicable, what is the current shoreline master program designation of the site?**

No designation

**h. Has any part of the site been classified as a critical area by the city or county? If so, specify.**

The area along the Lake Shannon shoreline is classified as a 225 foot Critical Area Ordinance (CAO) district by Skagit County.

**i. Approximately how many people would reside or work in the completed project?**

Not Applicable

**j. Approximately how many people would the completed project displace?**

None

**k. Proposed measures to avoid or reduce displacement impacts, if any.**

Not Applicable

**l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.**

Not Applicable

**m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any.**

The proposed spongy moth eradication will help protect forest lands of long-term commercial significance.

## 9. Housing

**a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-**

income housing.

Not Applicable

- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

Not Applicable

- c. Proposed measures to reduce or control housing impacts, if any.**

Not Applicable

## 10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

Not Applicable

- b. What views in the immediate vicinity would be altered or obstructed?**

None

- c. Proposed measures to reduce or control aesthetic impacts, if any.**

Not Applicable

## 11. Light and Glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?**

Not Applicable

- b. Could light or glare from the finished project be a safety hazard or interfere with views?**

Not Applicable

- c. What existing off-site sources of light or glare may affect your proposal?**

Not Applicable

- d. Proposed measures to reduce or control light and glare impacts, if any.**

Not Applicable

## 12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity?**

Boating, hiking, walking, jogging, biking, picnicking.

The Upper Skagit River Garden Club is located inside and outside the southwest boundary.

A trail head of the Cascade Trail can be accessed at the intersection of State Route 20 and Baker River Rd. The Cascade Trail is a scenic hiking trail between Sedro Wooley and Concrete.

**b. Would the proposed project displace any existing recreational uses? If so, describe.**

No

**c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any.**

WSDA uses extensive outreach to inform parks and recreation departments, community groups, and the community at-large. WSDA offers a prior notification list upon which interested parties can request to be placed. Persons on the prior notification list are informed by their method of choice (robocall, email, text message) the day before each application occurs.

### **13. Historic and Cultural Preservation**

**a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

National and State Historic sites

Lower Baker River Hydro Electric Power Plant- located outside the southwest boundary.  
Baker River Bridge- located outside the southwest boundary.

Eligible sites

Open-Pit Quarry, Garage and Repair Building, Rock Storage Tower and Tunnel, Rock-Crusher Complex.

These structures are all “part of an interconnected system for manufacturing Portland cement.”

**b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

No

**c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

Washington Information System for Architectural & Archaeological Records Data (WISSARD) was used to locate cultural and historic resources.

- d. **Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

The proposal will have no effect on resources.

#### **14. Transportation**

- a. **Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

Baker River Road enters the site from the southwest. State Route 20 runs west and east outside the southern boundary.

- b. **Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

The site is not served by public transit. Skagit County Transit (SKAT) operates limited regional bus transit to the town of Concrete.

- c. **Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

No

- d. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

The aerial applicator will be in compliance with all Federal Aviation Administration (FAA) rules, regulations and directives. FAA will be provided a congested airspace plan, and be the final authority on all aircraft operations associated with this proposal.

- e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

Not Applicable

- f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

No

- g. **Proposed measures to reduce or control transportation impacts, if any.**

Not Applicable

## 15. Public Services

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

No

- b. Proposed measures to reduce or control direct impacts on public services, if any.

Not Applicable

## 16. Utilities

- a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Not Applicable

## C. Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

X Rian Wojahn

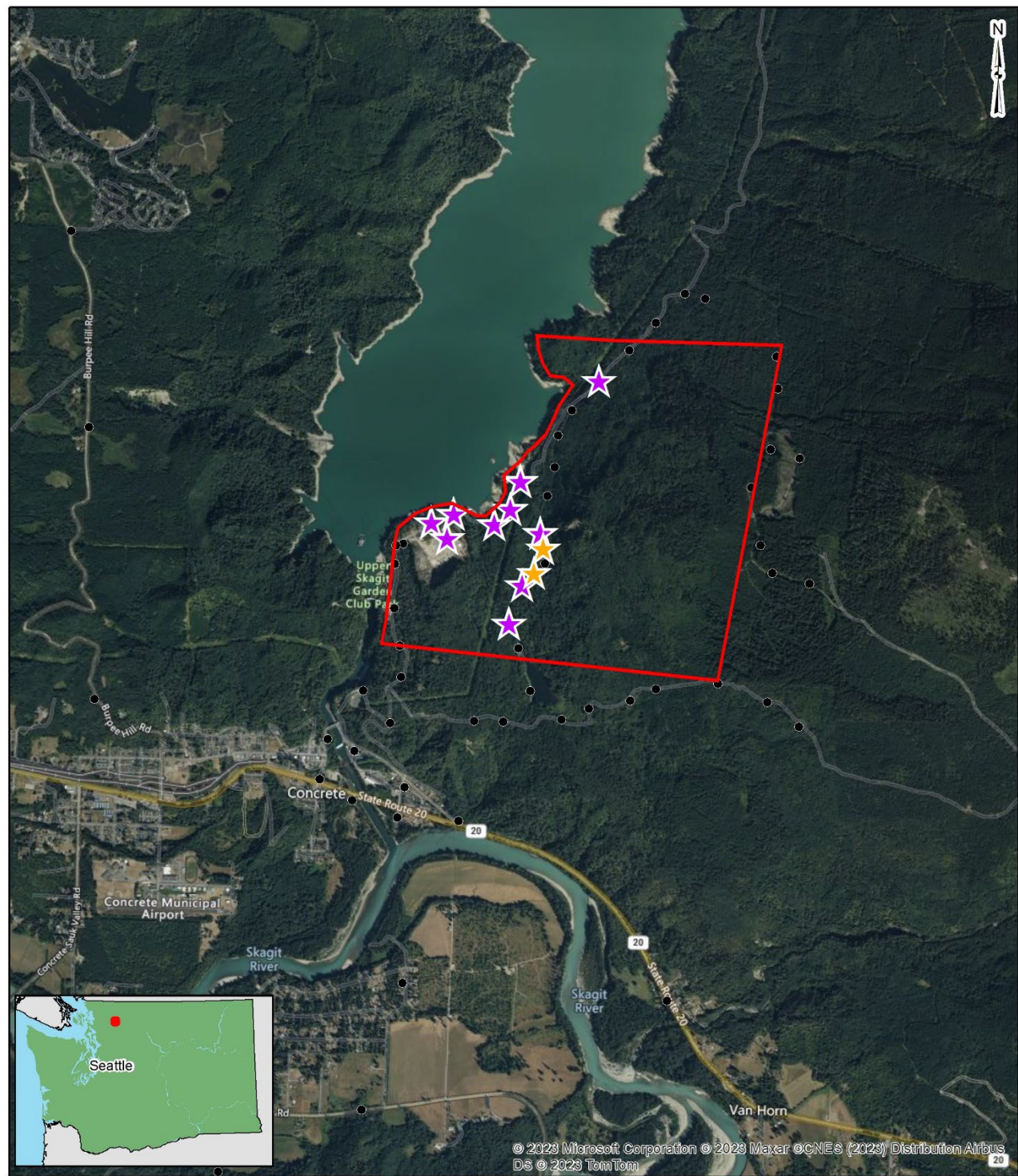
Type name of signee: Rian Wojahn

Position and agency/organization: Pest Eradication Coordinator/WSDA

Date submitted: 1/30/2024



## 2024 Proposed Spongy Moth Eradication – Concrete, Skagit County



Date: 12/27/2023

### Trap Status:

- ★ Positive Detection, 2022
- ★ Positive Detection, 2023
- Negative Trap Site

▭ Eradication Boundary

0 0.25 0.5 1 Miles

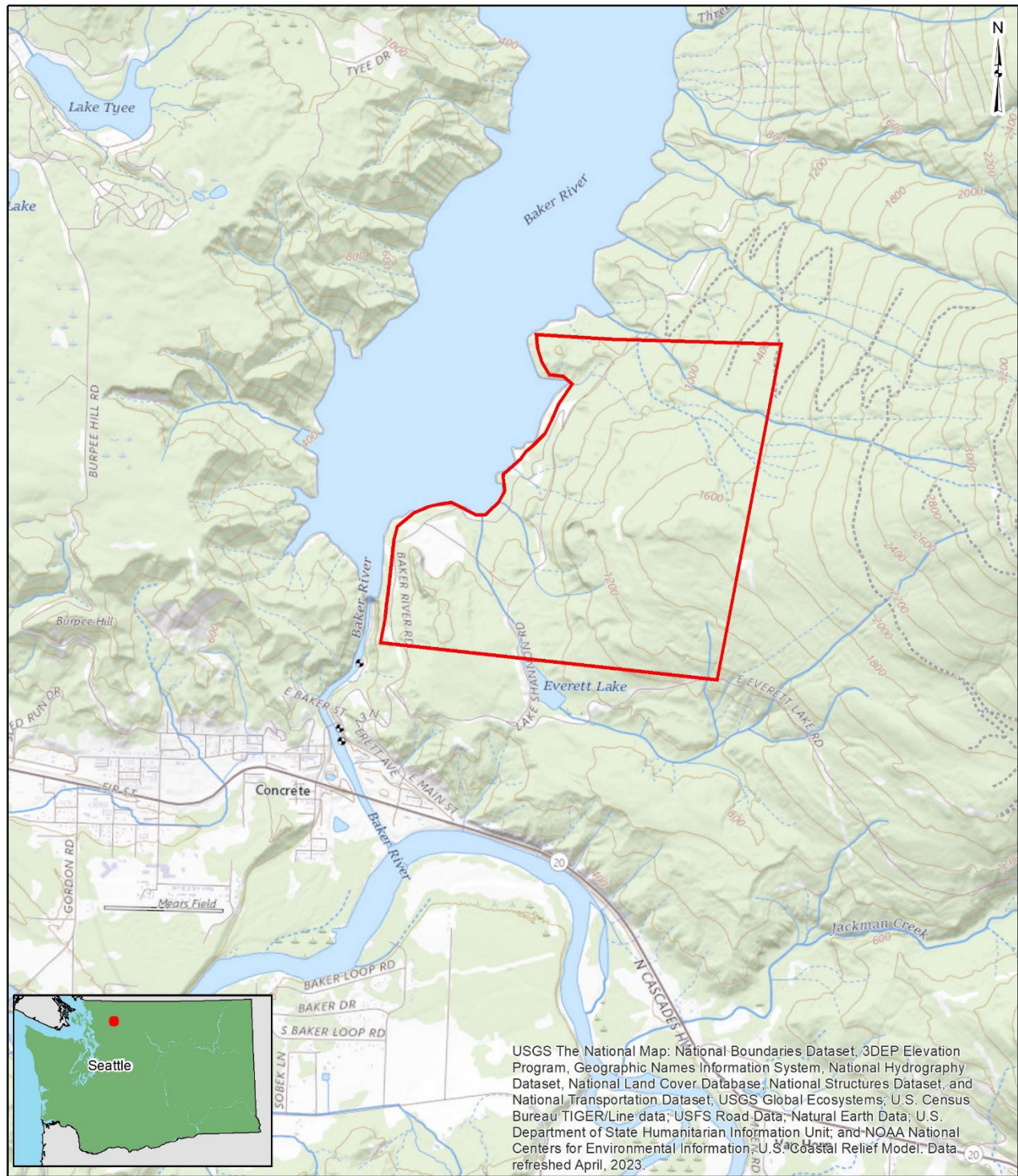


**920 Acres**

Cartography by: Landon Udo



## 2024 Proposed Spongy Moth Eradication – Concrete, Skagit County



Date: 1/17/2024

Eradication Boundary

0 0.25 0.5 1 Miles



**920 Acres**