

SEPA Nonproject Review Form

PART I - FRAMEWORK

1) Background

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

Asian giant hornet (*Vespa mandarinia* Smith, 1852) Eradication Program in Washington State.

The first detection of Asian giant hornet in the United States was in the Blaine, Whatcom County area of Washington State during December, 2019. Once the detection was announced in late-December, 2019, a beekeeper in Custer, Whatcom County provided photos of a bee kill to his hives which strongly resembled an Asian giant hornet attack. A dairy farmer in Custer also reported running over a nest in August, 2019, followed by a large hornet repeatedly trying to sting his tractor window. In Bellingham, Whatcom County a beekeeper reported seeing Asian giant hornet around his hives during fall, 2019. Coloration of the specimen detected in Blaine, Washington State pointed to East Asia as the possible area of origin. After DNA analysis by an Asian giant hornet specialist in Japan, it was determined that the specimen originated from South Korea.

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

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

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d) Designated responsible official

Kelly McLain
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e) Describe the planning process schedule/timeline

A determination of impact from the following proposal will be made in April, 2020. The public will then have fourteen (14) days to submit comments on the proposal. If allowed to proceed, eradication activities will begin in July, 2020. Eradication activities will last until approximately November, 2020.

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

Asian giant hornet is a ground nesting hornet. Nest removal locations remain unknown at this time. 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 states, 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.

If needed, under RCW 17.24.171 the Director of Agriculture may ask the Governor for an emergency declaration. Quarantine actions may, but are not expected to be, needed. Quarantine actions would be allowed under RCW 17.24.041

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 Asian giant hornet (*Vespa mandarinia* Smith, 1852) from becoming established in Washington State. Native to East Asia, Asian giant hornet is the world's largest hornet. Asian giant hornet is a pest of European honey bees (*Apis mellifera* L.), native pollinators and other insects. Ten to twenty Asian giant hornet workers can kill a hive of 30,000 honey bees within a few hours. Furthermore, in 2019, approximately 40 deaths in Japan were attributed to stings from the Asian giant hornet. If allowed to become established, Asian giant hornet poses a serious negative threat to the environment, economy, and human health of Washington State.

- 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 Asian giant hornet from Washington State. If allowed to establish, Asian giant hornet will attack apiaries and native pollinators throughout the state. As an agricultural state, loss of honey bees and native pollinators has the potential to devastate a vast segment of our state's economy.

Asian giant hornet is also a threat to the safety and health of the public. It's known that Asian giant hornet nests in the ground or under old logs and tree roots; however, until discovered the nest locations are unknown. This leaves beekeepers, landscapers, arborists, gardeners, power-line workers, hikers and the overall general public vulnerable to attack. Asian giant hornet has a powerful sting and has the ability to sting repeatedly. During the summer and early-fall, Asian giant hornets are extremely aggressive if disturbed.

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

Private property issues have the potential to negatively impact the objective of eradication. WSDA will need cooperation from the public as a whole in order to eradicate Asian giant hornet from Washington State. In an attempt to mitigate private property issues, WSDA has instituted an aggressive public outreach campaign.

- 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 given the WSDA eradication authority. The WSDA has also implemented an aggressive outreach/education campaign.

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 Asian giant hornet from Washington State will ensure public safety, and promote continued pollination from private and industrial apiaries, as well as local pollinators.

4) Regulatory Framework

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

Due to the use of pesticides during nest removal, WSDA will need to address environmental regulations and critical areas.

- 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.)

None

- 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:

The USDA-APHIS issued New Pest Response Guidelines (NPRG) on February 10, 2020 and will be drafting an Environmental Assessment (EA) for the Asian giant hornet Eradication Program. After consultation with the Environmental Protection Agency (E.P.A) and the WSDA Pesticide Division, an Experimental Use Permit (EUP) for pesticides will be issued to the WSDA upon completion of the permit application. All relevant documents will be posted on the WSDA website.

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

The USDA-APHIS New Pest Response Guidelines referenced above, as well as the Ministry of Forestry in British Columbia, Canada, September 2019 Pest Alert for the Asian giant hornet. Asian giant hornet was detected and a nest removed in Nanaimo, British Columbia in September, 2019. The WSDA issued a Pest Alert for the Asian giant hornet in January, 2020. Asian giant hornet has been studied extensively by scientists around the world. Studies include information on topics such as nest building, mating and distribution modeling.

A closely related species, Asian hornet (*Vespa velutina* Lepeletier), was introduced into France during 2005. Since its introduction into Europe, Asian hornet has spread to Belgium, Germany, Italy, Netherlands, Portugal, Spain, Balearic Islands, United Kingdom and the Channel Islands.

6) Public Involvement (Optional)

WSDA has implemented an aggressive public outreach campaign. Elements of the campaign include: direct mailings to beekeepers, press releases, radio and television interviews, stakeholder updates, presentations at beekeeping clubs, paid Facebook and Instagram ads, listserv updates and a dedicated webpage on the WSDA site. Future plans include a YouTube informational video, Asian giant hornet management training to effected industries (landscapers, arborists, beekeepers, pest control technicians) and possible coordination with National Geographic (NatGeo) during a nest removal.

- 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.

Washington State Department of Health (DOH) is coordinating with local health care facilities in an effort to inform and educate employees about the Asian giant hornet. USDA-APHIS sent pest alerts and informational letters to the 29 recognized tribal nations in Washington State. Washington Invasive Species Council (WISC) is providing outreach and a cellphone reporting app. Washington State Departments of Natural Resources (DNR), Fish and Wildlife (WSFW) and Transportation (WSDOT) will also be working with WSDA on Asian giant hornet response activities. Beekeepers in Washington State will be on the front-lines and communicating Asian giant hornet sightings around there hives.

- 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.]

Through information gained from public Involvement (6 above) and help from other agencies (6.a above), WSDA will be able to rapidly respond and remove Asian giant hornet nests.

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.

Eradication activities for Asian giant hornet could take place throughout a vast amount of landscapes across Washington State. In its native range, Asian giant hornet prefers forested foothills and urban greenbelt areas; prairies and flatlands are not preferred habitat. Nests are constructed below ground or in/around old logs and tree roots. Each nest site will introduce different challenges, and environmental conditions cannot be predicted.

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.

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.

To date, there are no alternative options or solutions for this project. Asian giant hornet nests must be found and removed. Each nest can produce approximately 200+ queens each year, and immediate eradication is imperative.

- 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.

None identified.

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

If alternatives to nest removal are developed, WSDA will analyze those options.

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

To date, no alternative solution has 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:

This proposed program does not have an alternative action other than no action. The proposed plan is to conduct survey and trapping work that eventually leads to eradication of identified ground nests of the Asian Giant Hornet. The final eradication is intended to take place using appropriately labeled pesticide active ingredients. The main alternative of no action would be both environmentally and economically devastating to the state of Washington and its citizens, 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 soil displacement, vegetation removal and use of pesticide(s) during nest removal. It's not known what the surrounding environment will be at a nest removal site. Potential impacts will be addressed during the nest removal 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 properly remove Asian giant hornet nests, unavoidable impacts listed in 9.c above, may be needed. Without these impacts each unremoved Asian giant hornet nest will produce large amounts of queens and eradication will no longer be feasible.

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.

Approximately twenty-four (24) hours after each nest removal, WSDA eradication personnel will revisit the nest removal site. Any remaining Asian giant hornets will be removed from the environment and traps will be deployed throughout the area.

- 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 nest location technology or updated Asian giant hornet eradication techniques become available.

WAC 197-11-444, Elements of the Environment

Natural Environment

a. Earth

Asian giant hornet is a ground nesting hornet. Nests will likely be found in abandoned rodent holes or under tree roots. Preferred topography for the Asian giant hornet is areas near forested foothills and urban greenbelt areas.

b. Air

The presence of Asian giant hornet, as well as nest removal activities will not affect air quality.

c. Water

Nest locations are not known. However, water resources should not be affected.

d. Plants and animals

Nest locations are not known. Removing Asian giant hornet nests will have a positive impact on honey bees, native pollinators and other insects, which in-turn will benefit plants, wildlife and fish.

e. Energy and natural resources

Not required for eradication activities.

Built Environment

a. Environmental health

Pesticides will be used during Asian giant hornet nest removal. However, it's not known at this time what pesticides will be used. The WSDA Pesticide Management Division will be working with eradication personnel to ensure all measures are taken to mitigate public health issues.

b. Land and shoreline use

None

c. Transportation

Depending on nest removal location; sidewalks or parts of local streets may need to be closed. Length of closure will depend on proximity to a nest. WSDA will work with local government officials if the need arises.

d. Public services and utilities

As stated above, recreational areas, schools or other facilities may also need to be closed.