SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background [HELP]

1. Name of proposed project, if applicable:
   Aquatic Mosquito Control NPDES and State Waste Discharge General Permit

2. Name of applicant:

Washington State Department of Ecology

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

Shawn Ultican
Dept of Ecology
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4. Date checklist prepared:

November 6, 2023

5. Agency requesting checklist:

Washington State Department of Ecology

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

The public comment period for the SEPA determination will run concurrently with the public review of the draft permit documents, November 15, 2023 through December 29, 2023. A permit reissuance decision is anticipated for Spring of 2024. If issued, the permit is effective for 5 years.

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

Not at this time. In the future it is possible that Ecology may decide to add additional pesticides to the list of allowed active ingredients in the draft permit. However, this would be considered a new discharge and be required to undergo the SEPA process at that time.

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

Information is available through Ecology's aquatic pesticide permit web page:
https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Aquatic-pesticide-permits

This includes Best Management Practices for Mosquito Control:
https://apps.ecology.wa.gov/publications/summarypages/0310023.html

Additional information is available from WSDA Pesticide Registration related to the review of pesticides and other products used during mosquito treatment activities. Please contact them by email pestreg@agr.wa.gov or phone (360) 902-2030.

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.

No

10. List any government approvals or permits that will be needed for your proposal, if known.
Applicators (Permittees) must obtain the appropriate pesticide applicators license from the Washington State Department of Agriculture.

11. Give 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 Draft Aquatic Mosquito Control General Permit covers all mosquito control activities that result in a discharge of larvicides or indirect discharge of adulticides to waters of the state of Washington. This permit it does not apply to homeowner use of residential pesticides.

12. 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.

This draft permit would cover discharges to Waters of the state of Washington.

This permit does not apply to:

1. Federal lands in Washington where a federal agency made the decision to apply or is the entity applying larvicides or adulticides.

2. Indian Country and trust or restricted lands except portions of the Puyallup Reservation as noted. Puyallup Exception: Following the Puyallup Tribe of Indians Land Claims Settlement Act of 1989, 25 U.S.C. § 1773; this permit does apply to land within the Puyallup Reservation except for discharges to surface water on land held in trust by the federal government.

B. Environmental Elements [HELP]

1. *Earth* [help]

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

Varies across the state depending on where a treatment occurs.

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

Varies across the state depending on where a treatment occurs.

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.

Varies across the state depending on where a treatment occurs.

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

Varies across the state depending on where a treatment occurs.

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.

N/A

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

N/A

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

N/A

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

N/A

2. Air [help]

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.

There are several potential sources of emissions to the air including: pesticide vapors from treatment and exhaust from equipment used to apply the pesticides (truck, airplane, gas powered sprayer, etc). The duration of the impact from the aerosols would be temporary and short lived, since they would not last much longer than the pesticide application process.

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:

The adulticide labels require that application only occur when wind speeds are I0 mph or less. In addition, application of aculticides is performed during those periods of time when adult mosquitos are most active (after sunset and before sunrise). This limits the time and duration that adulticides can be effectively applied.

3. Water [help]

a. Surface Water: [help]

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.

Yes. The purpose of the proposed permit is to authorize the discharge of pesticides that enter the water directly or indirectly depending on the type of treatment. The water body where the discharge will occur to varies across the state depending on where treatment occurs.

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. The purpose of the proposed permit is to authorize the discharge of pesticides that enter the water directly or indirectly depending on the type of treatment. The waterbodies where the discharge will happen varies across the state depending on where treatment occurs.

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.

None

4) Will the proposal require surface water withdrawals or diversions? Give 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.

Likely yes because the discharges covered by this permit occur in or near water.

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.

Yes. The proposed permit authorizes the discharge of a specific list of pesticides to waters of the state. The discharge will be either direct or indirect due to pesticide drift from the treatment area. The amounts discharged are expected to be small, and are included in the required annual reports.

b. Ground Water: [help]

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 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 (for example: 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.

N/A

c. Water runoff (including stormwater):

1) 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.

N/A

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

Yes. The proposed Aquatic Mosquito Control General Permit is specifically designed to condition the discharge of potential pollutants that would occur as a result of mosquito control activities. The pesticides and other products proposed for discharge are found in the non-project portion of this checklist. The volume of the discharge varies by project and will follow use rate restrictions on the label for the product being used.

3) 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:

Product label requirements limit the amount of pesticide that can be applied at any one time which will limit the amount of pesticide available to runoff with stormwater. There are additional requirements in the permit, and this issue can also be addressed in management plans developed prior to treatment.

4. Plants [help]

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

__x__deciduous tree: alder, maple, aspen, other
__x__evergreen tree: fir, cedar, pine, other
__x__shrubs
__x__grass
__x__pasture
__x__crop or grain
__x__ Orchards, vineyards or other permanent crops.
__x__ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
__x__water plants: water lily, eelgrass, milfoil, other
__x__other types of vegetation

The actual types of vegetation present at the sites where Permittees operate under this permit will vary across the state depending on where a treatment occurs.

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

None. Some minimal damage to vegetation may occur due to moving people and equipment through an area targeted for treatment.

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

Unknown, and this will vary across the state depending on where a treatment occurs. This can be addressed in management plans developed prior to treatment, when applicable. There are also requirements on product labels designed to protect vulnerable non-target species.

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

None

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

Unknown, and will vary across the state depending on where a treatment occurs.

5. Animals [help]

a. List any birds and other animals which 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:
mammals: deer, bear, elk, beaver, other:
fish: bass, salmon, trout, herring, shellfish, other _____

This will vary across the state depending on where treatment occurs.

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

This will vary across the state depending on where treatment occurs and can be addressed in management plans developed prior to treatment, when applicable. There are also requirements on product labels designed to protect vulnerable non-target species.

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

This will vary across the state depending on where treatment occurs and can be addressed in management plans developed prior to treatment, when applicable.

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

N/A

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

This will vary across the state depending on where treatment occurs and can be addressed in management plans developed prior to treatment, when applicable.

6. Energy and Natural Resources [help]

a. 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.

N/A to the proposed permit. Gas and electricity are necessary for actual treatment activities.

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

No

c. 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:

N/A

7. Environmental Health [help]

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

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

Issuing the proposed permit will not require special emergency services, however actions taken under permit coverage by the Permittees may. Pesticide spills can happen but the proposed permit requires that Permittees have a plan in place for cleaning up a spill if it were to occur.

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.

Pesticide spills can happen, but the proposed permit requires that Permittees have a plan in place for cleaning up a spill if it were to occur. Usually this involves following the pesticide label requirements which include spill clean-up instructions

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.

This will vary across the state depending on the type of treatment that occurs and can be addressed in management plans developed prior to treatment, when applicable.

4) Describe special emergency services that might be required.

This will vary across the state depending on the type of treatment that occurs and can be addressed in management plans developed prior to treatment, when applicable.

5) Proposed measures to reduce or control environmental health hazards, if any:

The proposed permit requires that Permittees have a plan in place for cleaning up a spill if it were to occur. Usually this involves following the pesticide label requirements which include spill clean-up instructions.

b. Noise

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

N/A

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.

Issuing the proposed permit will not create noise, however activities that take place under coverage of the proposed permit may create noise from equipment, vehicles, and foot traffic.

3) Proposed measures to reduce or control noise impacts, if any:

None.

8. Land and Shoreline Use [help]

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.

Unknown and will vary across the state depending on where treatments occur.

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 as a result 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?

Unknown and will vary across the state depending on where treatments occur. No agricultural lands will be converted.

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:

This will vary across the state depending on where treatment occurs and can be addressed in management plans developed prior to treatment, when applicable.

c. Describe any structures on the site.

This will vary across the state depending on where treatment occurs and can be addressed in management plans developed prior to treatment, when applicable.

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

No

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

This will vary across the state depending on where treatment occurs and can be addressed in the management plans developed prior to treatment, when applicable.

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

This will vary across the state depending on where treatment occurs and can be addressed in the management plans developed prior to treatment, when applicable.

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

This will vary across the state depending on where treatment occurs and can be addressed in the management plans developed prior to treatment, when applicable.

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

Potentially yes, but this will vary across the state depending on where treatment occurs and can be addressed in the management plans developed prior to treatment, when applicable

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

This will vary across the state depending on where treatment occurs and can be addressed in the management plans developed prior to treatment, when applicable.

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

None

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

N/A

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

N/A. The proposed permit should not affect existing or projected land uses. This issue can be addressed in the management plans developed prior to treatment, when applicable.

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

This issue can be addressed in the management plans developed prior to treatment, when applicable.

9. Housing [help]

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

N/A

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

N/A

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

N/A

10. Aesthetics [help]

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

N/A

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

N/A

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

N/A

11. Light and Glare [help]

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

None expected as treatment occurring under the proposed permit will most likely take place during the day.

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

No

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

None expected

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

None

12. Recreation [help]

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

This will vary across the state depending on where treatment occurs and can be addressed in the management plans developed prior to treatment, when applicable.

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

Treatment occurring under the proposed permit could impact recreational activities on a short term (e.g. hours, days) basis. No permanent impact is expected. Some types of treatment are intended to increase recreational opportunities when mosquitos are controlled effectively.

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

None

13. Historic and cultural preservation [help]

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.

No impacts to buildings or structures are expected. This will vary across the state depending on where treatment occurs and can be addressed in the management plans developed prior to treatment, when applicable.

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.

This will vary across the state depending on where treatment occurs and can be addressed in the management plans developed prior to treatment, when applicable.

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.

This will vary across the state depending on where treatment occurs and can be addressed in the management plans developed prior to treatment, when applicable.

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.

None specifically included in the proposed permit, however it does require Permittees to follow all applicable federal, state and local laws. This could include historic and cultural preservation.

14. Transportation [help]

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.

This will vary across the state depending on where treatment occurs and can be addressed in the management plans developed prior to treatment, when applicable.

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?

Unknown and will vary across the state depending on where treatment occurs.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

None

d. 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).

Unlikely to require new roads.

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

Yes, and this will vary across the state depending on where treatment occurs

f. 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?

This will vary across the state depending on where treatment occurs and can be addressed in the management plans developed prior to treatment, when applicable.

g. 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 impacts of this type expected. This can be addressed in the management plans developed prior to treatment, when applicable.

h. Proposed measures to reduce or control transportation impacts, if any:

None included in the proposed permit.

15. Public Services [help]

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.

N/A

16. Utilities [help]

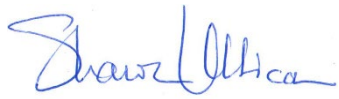
a. Circle utilities currently available at the site:
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

This will vary across the state depending on where treatment occurs and can be addressed in the management plans developed prior to treatment, when applicable.

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.
N/A

C. Signature [HELP]

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.

Signature: 

Name of signee: Shawn Ultican

Position and Agency/Organization: Aquatic Pesticide Permit Specialist, WA Department of Ecology

Date Submitted: November 6, 2024

D. Supplemental sheet for nonproject actions [HELP]

(**IT IS NOT NECESSARY** to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

The proposed permit will allow the discharge of a specific list of pesticide active ingredients, adjuvants, or other products to air and waters of the state during treatments. This will vary with each treatment project and can be addressed in the management plans developed prior to treatment, when applicable.

Proposed measures to avoid or reduce such increases are:

The proposed permit and its conditions, in addition to the product label requirements, are the controls used to limit the amount of pesticide discharged.

Permittees must follow the EPA approved FIFRA Label, and any label requirements specific to use in Washington State. The FIFRA Label provides limits on the application of the pesticide product.

Permittees who plan to use adulticides to manage mosquito populations must complete an IPM plan to address planning and controls around the discharge of adulticides. Permittees who only apply larvicides may use the Ecology publication "Best Management Practices for Mosquito Conh·ol, May 2004 (publication number 03-1 0-023) or equivalent in place of developing their own IPM plan. If the Permittee later decides to include adulticides in its mosquito control operations, it must develop an IPM plan prior to using adulticides.

Compliance with the proposed draft permit would also require permittees to follow FIFRA, the Washington Pesticide Control Act and the Washington Pesticide Application Act.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

The treatments taking place under coverage of the proposed permit are unlikely to affect plants. The pesticides used target insects, which have different chemical pathways that are not present in plants. Potential impacts on animals, fish, or marine life will vary with each treatment project and can be addressed in the management plans developed prior to treatment, when applicable. For more information, see the Fact Sheet for the Draft Aquatic Mosquito Control permit available on this website: https://ecology.wa.gov/mosquitopermit

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

The proposed permit and its conditions, in addition to the product label requirements, are the controls that are used to protect non-target organisms.

3. How would the proposal be likely to deplete energy or natural resources?

Ecology does not anticipate discharges conducted under this permit to deplete energy or nahtral resources. Treatments conducted under this permit may temporarily impose water use restrictions for entities with stuface water withdrawal rights, however, the quantity of water available to water rights holders will not be impacted.

Proposed measures to protect or conserve energy and natural resources are:
N/A

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Discharges conducted under this proposed draft permit may occur in areas where sensitive, threatened or endangered species occur. Impacts from treatments could include direct toxic effects

or secondary effects on food supply.This will vary with each treatment project and can be addressed in the management plans developed prior to treatment, when applicable.

Proposed measures to protect such resources or to avoid or reduce impacts are:

The proposed permit and its conditions, in addition to the product label requirements, are the controls used to limit these impacts. This will vary with each treatment project and can be addressed in the management plans developed prior to treatment, when applicable.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Some short-term affects are likely with restrictions on entry or recreation in areas treated under coverage of the proposed permit. During treatments there may be restricted access to the lands and shorelines where application occurs. The duration of the restricted access should be temporary and short lived. After the temporaty restriction to land and shoreline use is lifted; land and shoreline use may be enhanced by the effective management of mosquito populations.

Proposed measures to avoid or reduce shoreline and land use impacts are:

The permit includes requirements for public notification, signage, and communications with wildlife refuges prior to aerial application of adulticides or larvicides over the refuge.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Ecology does not anticipate an increase in demands on transportation or public services. The majority of Permittees that obtain coverage under previous issuances of this permit are public entities conducting mosquito control activities. Treatments conducted under this proposed draft permit may have the effect of reducing mosquito borne illness, which could reduce the burden on public health entities and veterinary health entities.

Proposed measures to reduce or respond to such demand(s) are:

N/A

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

The proposed permit requires compliance with state and federal laws regulating water quality. ESA listed and state listed endangered, threatened or sensitive species have the potential to be impacted under this permit. Ecology believes that if permittees follow the conditions in this permit, the FIFRA label, the Washington Pesticide Control act and the Washington Pesticide Application Act that impacts to ESA listed and State listed species can be avoided.