

	<b>U.S. Fish and Wildlife Service</b> <b>Pesticide Use Proposal</b>	<b>Date:</b> 07/20/2011

**PUP Number:** R7-09-74500-001

**Treatment Site:** ALASKA MARITIME NATIONAL WILDLIFE REFUGE

**Product Trade Name:** Brodifacoum-25W Conservation

**Region:** 7

**Org Code:** 74500

**Year:** 2009

**State/County:** AK/ALEUTIANS WEST CENSUS AREA

**Duty Station:** ALASKA MARITIME NATIONAL WILDLIFE REFUGE

**Management Unit(s):** Rat Island

**Map Attached:** Yes

**Status:** Approved by WO with Modifications

**Pesticide Use Pattern:**

Need for Treatment: Invasive Species

Treatment Site: Terrestrial

Treatment Site Land Type: grassland, tundra

Is the crop being treated a genetically modified organism(GMO) (Y/N): N

Management Action/Economic Threshold:

Rat Island was treated with rodenticide in Oct 2008 to eradicate rats from the island. In 2009, the island will be searched for rats. If rats, rat sign, or rat activity is detected, rodenticide will be hand broadcast in a limited area. The treatment threshold is one individual rat so eradication is complete.

How does this pest(s) interfere with achieving habitat and/or wildlife management objectives?:

The goal of eradicating rats from Rat Island is restoration and conservation of natural diversity of native vegetation and wildlife, especially nesting seabirds.

Target Pest(s): Norway rat (Rattus norvegicus )

**Pesticides:**

Trade Name: Brodifacoum-25W Conservation

Common Name: brodifacoum

U.S. EPA Registration Number: 56228-36

Manufacturer: Bell Laboratories, Inc.

Label URL:

MSDS URL:

**Pesticide Details:**

Restricted Use Pesticide (Y/N): Y

Is the treatment site type listed on the label (Y/N): Y

Is pest listed on label: Y

If the crop, type of vegetation, or site type is not listed, is there a current Section 18 exemption under which you are proposing to operate (Y/N): N

If the crop, type of vegetation, or site type is not listed, is there a current Section 24c exemption under which you are proposing to operate (Y/N): N

	<b>U.S. Fish and Wildlife Service Pesticide Use Proposal</b>	<b>Date:</b> 07/20/2011

Supplemental Label for Proposed Use (Y/N): N

Tank Mix (Y/N): N

Adjuvants: None

Other Ingredients: N/A

Number of Applications: 2

Application Period: June

Application(s):

Note: Proposed pesticide applications in this PUP may not reflect actual on-the-ground pesticide applications. Specifically, PUPs may include different application scenarios (e.g., spray equipment and rate combinations) to capture the breadth of application options that could be used to treat target species. Actual pesticide applications must be compliant with the pesticide label(s). The completed pesticide usage report will contain actual usage information associated with this PUP.

<u>Trade Name</u>	<u>Rate &amp; Unit</u>	<u>Method</u>	<u>Equipment</u>
Brodifacoum-25W Conservation	16 lbs/acre	Broadcast	Hand broadcast
Brodifacoum-25W Conservation	8 lbs/acre	Broadcast	Hand broadcast

Size of Treatment Area: 12.35 acres

REI (Restricted Entry Interval): None

Applicator Information: Contractor

**Approved IPM Plan (Y/N):** N

IPM Plan Year:

**Non-Chemical Controls Considered (Y/N):** Y

**IPM Strategy:**

Indicator baits and snap traps will be deployed to detect the presence of rats in addition to searching for droppings and other sign of recent rodent activity. If rat presence is confirmed, rodenticide will be applied.

**Best Management Practices:**

Field scouting/monitoring before pesticide application.

Use lowest effective application rate.

**Additional Best Management Practices:**

Bait application rate determined by bait uptake not to exceed label

Bait pellet and composition selected for effectiveness

PPE as directed by label

**Treatment Site Conditions:**

Topography (Degree Slope):

Soil Texture: Peat/Muck, Gravel, Sand, Sandy Clay

Soil pH: 5.1 to 6.8

	<b>U.S. Fish and Wildlife Service</b> <b>Pesticide Use Proposal</b>	<b>Date:</b> 07/20/2011

Soil Organic Matter: typically 65  
 Surface Water Type(s): Creek/Stream, Pond  
 Distance to nearest: Within 25 ft  
 Depth to Groundwater: Less than 2 feet  
 Distance to nearest potable water: Not Applicable  
 If Spot Treatment, Estimated % Cover to be Treated:  
 Is the Treated Area Naturally Flooded or Irrigated (Y/N): N  
 Irrigation Method: N/A

**Non-Target Species At/Near Treatment Area during or immediately after treatment (taxonomic groups):**

Crustaceans, Fish-eating birds, Mammals, Mussels, Passerines, Shorebirds, Waterfowl

**Are Impacts to Non-Target Species Expected? (Y/N): Y**

**Federally Listed Species and Critical Habitat(s):**

Key:  
 NE = No Effect  
 NLAA = Not Likely to Adversely Affect  
 LAA = Likely to Adversely Affect  
 JAM = Jeopardy/Adverse Modification  
 NJNAM = No Jeopardy/No Adverse Modification

Note: ESA Documentation is required for NE, NLAA, LAA, JAM and NJNAM Effects Determinations. Please ensure you are in compliance with the current Endangered Species consultation procedures.

<u>Species Common Name/Critical Habitat</u>	<u>Effects</u>	<u>Optional: Provide ESA text here or attach documents</u>
Northern Sea Otter	NLAA	3/10/2008 Consultation on file: 2008-0028
Steller sea-lion	NLAA	8/22/2008 Consultation on file
Steller's Eider	NLAA	3/10/2008 Consultation on file: 2008-0028

**Are there any other federally listed, proposed or candidate species or critical habitat(s) that occur (or may occur) at or near the site that are not listed above? (Y/N): N**

**Are there any state listed, proposed or candidate species or their habitats or other species of concern that may be affected by the proposed activity? (Y/N): N**

**Contact Person:** Steve Ebbert  
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	<b>U.S. Fish and Wildlife Service</b> <b>Pesticide Use Proposal</b>	<b>Date:</b> 07/20/2011

**Project Leader:** Will Meeks  
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**Alternate Contact:** Vernon Byrd  
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**Submitter Comments:**

USFWS Alaska Maritime National Wildlife Refuge has completed an Environmental Assessment for this project and a FONSI for the restoration project operations conducted in 2008. The 2008 project involved two helicopters, more than 15 people on the ground, and 50 tons of Brodifacoum Conservation 25W Conservation rodenticide. The 2009 effort is to apply by hand broadcast, if necessary, a maximum of 500 lbs of the same rodenticide used in 2008 on a maximum of 63 acres if the minimum effective application rate of 12 lbs per acres is used in a single application. The number of acres treated will be less if the higher application permitted is used (for coastal areas) of 18 lbs per acre, or if there is more than one application. Only 500 lbs of bait will be taken to the island, or 1.25 lbs of active ingredient, and it may not be applied if no sign of rats is detected. The refuge has permission from the Alaska Board of Game to use poisons to kill wildlife, and has applied for a Nuisance Wildlife Permit with Alaska Department Fish and Game. The Alaska Coastal Management Program reviewed the larger eradication effort in 2008 for consistency determination.

**Reviewer Information:**

Date: 04/28/2009  
 Reviewer: Will\_Meeks@fws.gov  
 Reviewer Type: Field (Dis)Approver  
 Action Taken: Reviewed by Field (Dis)Approver and forwarded to RO  
 Comments: N/A

To the best of the Field Approver's knowledge, this PUP is accurate, complete, and the information provided is in compliance with the pesticide label(s), with Service Policy, and with any pertinent local and State laws, regulations, and restrictions concerning each pesticide's use.

Date: 05/29/2009  
 Reviewer: philip\_johnson@fws.gov  
 Reviewer Type: Regional (Dis)Approver  
 Action Taken: Reviewed by RO (Dis)Approver and forwarded to WO  
 Comments: 1. The proposed application rates were incorrect (an initial application of 18 lbs/acre was proposed; second application of 12 lbs/acre). These proposed application rates were removed by the Regional Approver and application rates conforming to label requirements were added (16 lbs/acre for initial application and 8 lbs/acre for second application, if necessary).

	<b>U.S. Fish and Wildlife Service</b> <b>Pesticide Use Proposal</b>	<b>Date:</b> 07/20/2011

2. The submitted PUP specified an application area of 63 acres (25.5 ha). The refuge has modified this initial estimate, requiring a change in the PUP database. I attempted to change this to a maximum of 12.35 acres (5 ha), for consistency with the Supplemental Environmental Assessment (SEA). Currently the PUP database cannot accomodate that change (it will only take integers in that field), but this issue is being resolved. In the interim I've approved this for 13 acres. If possible, the National Reviewer should modify the acres treated to 12.35 acres, for consistency.
  
3. Application is approved only if rats or rat sign are detected in a single, limited geographic area on the island. If two or more geographically distinct areas have rats, it is likely that a hand broadcast application will not be effective. This stipulation is consistent with previous discussions with Refuge staff and managers, and with the approach outlined in the SEA.
  
4. Approval of this PUP is contingent upon compliance with the National Environmental Policy Act (NEPA) and completion, by the Refuge, of any required NEPA documentation associated with this action. My understanding is that the Supplemental EA has been approved by the Regional Director.
  
5. Approval of the PUP is contingent on Endangered Species Act compliance (e.g., no effect determination, informal or formal consultation, as appropriate).
  
6. Per label directions, the field crew should monitor the baited area periodically and, using gloves/proper PPE, collect and dispose of any dead rats. Application area should also be monitored for non-target impacts to the extent staffing/resources allow. Any non-target mortality should be documented and carcasses either retained for analysis or disposed of properly.

Date: 05/29/2009  
 Reviewer: tiffany\_parson@fws.gov  
 Reviewer Type: National Dis(Approver)  
 Action Taken: Approved by WO with Modifications  
 Comments: See and follow regional comments. We can attach the additional documents as part of the submitter comments after that function is finalized next week. Thanks!!

**Approval Period:** 1 year

**Approval Expires:** 12/31/2009