

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

PUP Number: R7-08-74500-002

Treatment Site: ALASKA MARITIME NATIONAL WILDLIFE REFUGE

Product Trade Name: Brodifacoum-25W Conservation

Region: 7

Org Code: 74500

Year: 2008

State/County: AK/ALEUTIANS WEST CENSUS AREA

Duty Station: ALASKA MARITIME NATIONAL WILDLIFE REFUGE

Management Unit(s): N/A

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:

Norway rats are an invasive species to refuge islands. The goal of this project is to remove Norway rats from Rat Island. Given high reproductive capacity of this pest species, the treatment threshold is one individual because eradication is possible.

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

Non-native rats infest 90% of island groups in the world, and they typically eliminate or greatly reduce nesting success of seabirds where they occur. 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

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which you are proposing to operate (Y/N): N

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: September - November

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 & Unit</u>	<u>Method</u>	<u>Equipment</u>
Brodifacoum-25W Conservation	16 lbs/acre	Aerial	Helicopter
Brodifacoum-25W Conservation	8 lbs/acre	Aerial	Helicopter

Size of Treatment Area: 6,870.00 acres

REI (Restricted Entry Interval): None

Applicator Information: FWS

Name of FWS Lead Certified Pesticide Applicator: Steve Ebbert

Approved IPM Plan (Y/N): N

IPM Plan Year:

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

IPM Strategy:

Alaska Maritime NWR currently works to prevent new rodent introduction onto rat-free refuge islands. The program includes shore- and ship-based rodent prevention and shipwreck response. The goal is to reduce the likelihood of a disabled ship to rats onto islands, including Rat Island. A combination of rodent traps and poison bait will be maintained at arrival points on Rat Island after the eradication and during monitoring phases. Other methods were considered for Rat Island rat eradication, including using bait stations, other toxicants, use of disease, trapping, biological control and fertility control. These alternatives are discussed in the Environmental Assessment for the project.

Best Management Practices:

Calibrate application equipment.

Field scouting/monitoring before pesticide application.

Pesticide application buffers around sensitive areas.

Use lowest effective application rate.

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Additional Best Management Practices:

Application only at windspeed less than 35 mph per label
 Bait application rate determined by bait uptake not to exceed label
 Carcass searches to monitor non-target impacts and for carcass retrieval
 Bait application timing designed to minimize nontarget risk and maximize uptake by target species
 Bait pellet and composition selected for effectiveness
 Bait hopper designed to minimize drift, prevent bait spread into water
 Flight plan designed to minimize nontarget impact
 PPE as directed by label

Treatment Site Conditions:

Topography (Degree Slope): Greater than 10.0 Degrees
 Soil Texture: Peat/Muck, Gravel, Sand, Sandy Clay
 Soil pH: 5.1 to 6.8
 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

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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	Requested. Consultation in progress.
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

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Submitter Comments:

USFWS Alaska Maritime National Wildlife Refuge has completed an Environmental Assessment for this project and a FONSI. Additionally 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 refuge has applied for an Aerial Application Permit from the State Of Alaska, and the Alaska Coastal Management Program is reviewing our submission for a consistency determination. NMFS is currently reviewing a Incidental Harassment Authority Permit for this project.

Reviewer Information:

Date: 04/08/2008
Reviewer: steve_ebbert@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

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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: 04/11/2008
Reviewer: philip_johnson@fws.gov
Reviewer Type: Regional (Dis)Approver
Action Taken: Reviewed by RO (Dis)Approver and forwarded to WO with modifications
Comments: Approval is contingent on completion of remaining administrative and/or permitting actions, including Section 7 consultation for Steller sea lion, ADEC aerial rodenticide application permit, and any Coastal Zone Management requirements.

Database currently shows Field (Dis)Approval by the submitter, a refuge biologist. Region requested the PUP be re-directed back to the Field for minor edits and so that the Refuge Manager could provide the Field (Dis)Approval. Due to database limitations, the original Field Level approval could not be removed. This note documents that the Refuge Manager, Greg Siekaniec, provided his approval to the PUP on 4/11/08.

Date: 04/25/2008
Reviewer: tiffany_parson@fws.gov
Reviewer Type: National Dis(Approver)
Action Taken: Approved by WO with Modifications
Comments: Please ensure that all necessary paperwork is completed before application. Thanks!

Approval Period: 1 year **Approval Expires:** 12/31/2008