



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Washington, D.C. 20240



In Reply Refer To:  
FWS/FHC/DEQ

MAY 18 2011

## Memorandum

To: Chief, Division of Natural Resources and Conservation

From: Chief, Division of Environmental Quality *[Signature]*

Subject: Palmyra Atoll National Wildlife Refuge Rat Eradication Project Pesticide Use Proposal (PUP# R1-11-12521-001)

The Service's Integrated Pest Management Policy requires that projects select the lowest risk, best available technology that achieves desired outcomes while minimizing effects to non-target species and the environment. Due to documented toxicity to trust species, the use of any rodenticide requires approval at the field, regional, and Washington office levels. Amongst the rodenticides, the anticoagulant brodifacoum is recognized as posing the greatest risk to non-target organisms due to its high toxicity and persistence, and any use by Service personnel or on Service lands is approved only when less toxic options have been adequately exhausted.

The Pesticide Use Proposal for eradication of rats on Palmyra Atoll beginning June 2011 proposes two applications of brodifacoum at rates of 80 kg/ha and 75 kg/ha, respectively. These rates are several times the maximum allowed on the brodifacoum conservation 25-W label and, as such, a supplemental label has been attained from EPA. Because significant non-target mortality may result from application of brodifacoum at these rates, an MBTA special use permit will be required.

With the following stipulations, the requested use of brodifacoum is approved for this eradication due to the complex ecological circumstances on Palmyra Atoll as described by Pacific Reefs NWR. Stipulation 1: In all future eradication projects, prime consideration will be given to options that result in reduced risk to non-target species, including less toxic rodenticides and lower application rates. Stipulation 2: The Refuge System will work closely with DEQ and other relevant programs on future island eradications to develop methodologies employing less toxic rodenticides.

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