

# Resource Areas to be Considered in the Environmental Impact Statement (EIS)

The U.S. Fish and Wildlife Service has identified issues related to the following resources or values to be considered in the EIS:

## ► Human Impacts

- Cultural
  - Impacts to cultural sites during application activities
- Alaska Native
  - Access limitations (2-5 weeks)
  - Actual or perceived toxicity of subsistence resources
- Island communities
- Program staff
  - Health & safety during application
- Refuge visitors
  - Health & safety during application
  - Access limitations (2-5 weeks)

## ► Fishery Resources

- Commercial, subsistence, and recreational fishing
  - Access limitations (2-5 weeks)
  - Actual or perceived toxicity of fishery resources

## ► Military and Historic Resources

- Impacts to sites during application activities

## ► Wildlife Impacts

- Birds (waterfowl, birds of prey, shorebirds, marine birds, land birds)
  - Rat impacts
  - Disturbance – during application
  - Toxicity
- Marine Mammals (pinnipeds & sea otters)
  - Disturbance during application
  - Toxicity through food chain (fish & invertebrates)
- Fish (freshwater & anadromous)
- Invertebrates

## ► Aquatic Resources

- Lakes, streams, shorelines/nearshore waters
  - Water quality/toxicity

## ► Designated Wilderness

- Impacts to character during application activities
- Long-term benefits

## ► Others – What are your resource areas of concern?



Photo: Carla Stanley | USFWS



Photo: Ian Shive

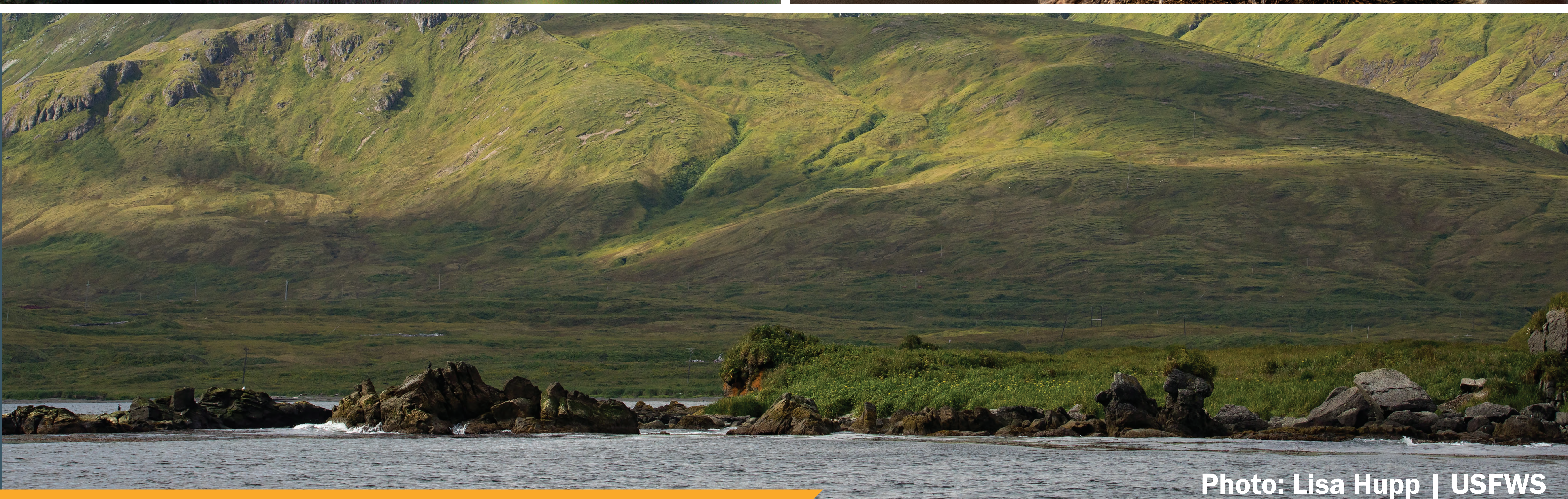


Photo: Lisa Hupp | USFWS



# General Project Timeline

The U.S. Fish and Wildlife Service is preparing this environmental impact statement (EIS) in accordance with the National Environmental Policy Act (NEPA). The general timeline of the project, which includes opportunities for public input, review and comment, is outlined below.

	<b>September 2024</b>	Notice of Intent to prepare an EIS; public scoping begins
<b>WE ARE HERE</b>	<b>October 2024</b>	Public scoping meetings
	<b>November 7, 2024</b>	Public scoping period concludes
	<b>November/December 2024</b>	Analyze comments and prepare scoping summary report
	<b>Winter 2024-Winter 2025</b>	Gather data, refine alternatives, analyzed impacts and prepare the Draft EIS
	<b>Late Winter/Early Spring 2026</b>	Draft EIS available for public comment (minimum 45-day review period)
	<b>Spring 2026</b>	Public meetings on the Draft EIS
	<b>Fall 2026</b>	Final EIS published
	<b>Winter 2026</b>	Record of Decision



# Potential Alternatives

## **ALTERNATIVE 1, (NO ACTION ALTERNATIVE):**

The U.S. Fish and Wildlife Service would not attempt to eradicate invasive rats from the four uninhabited Aleutian islands (Great Sitkin, Amchitka, Kiska, and Attu ). The presence and negative ecosystem impacts of invasive rats would continue under this alternative.

## **ALTERNATIVE 2:**

Rat Eradication Primarily Using Bait Pellets  
Containing the Rodenticide Brodifacoum

- ▶ **Applied according to Environmental Protection Agency (EPA) approved pesticide label.**
- ▶ **Likely applied in late fall (September/October) to maximize efficacy and safety.**
- ▶ **Typically requires 1 or 2 applications approximately 5-7 days apart.**
- ▶ **Application methods appropriate for the terrain of the uninhabited islands:**
  - Aerial application using helicopters is the preferred method due to the islands' large areas and rugged or inaccessible terrain.
  - Hand broadcast of bait pellets around natural water sources, infrastructure, and subterranean areas. All-terrain vehicles may be used, where feasible.
  - Drones, if practicable, may be used around targeted areas for more precise aerial bait placement.
  - Additional use of trapping, bait stations, or other ancillary methods to ensure complete coverage around man-made structures, such as remnant military infrastructure.

## **ALTERNATIVE 3:**

Rat Eradication Primarily Using Bait Pellets  
Containing the Rodenticide Diphacinone

- ▶ **Applied according to the EPA-approved pesticide label.**
- ▶ **May require up to 3 applications within a 25 day period.**
- ▶ **Likely applied in late fall (September/October) to maximize efficacy and safety.**
- ▶ **Application methods similar to Alternative 2.**



# Potential Alternatives

## **ALTERNATIVE 4:**

### Rat Eradication Using Emerging Genetic Biocontrol Technology

- ▶ **The use of genetically engineered rats to limit propagation or survival.**
- ▶ **This technology is not currently available for operational use in rats.**
- ▶ **Analyzed programmatically, and if eventually able to be used, additional supplemental NEPA analysis would be conducted for it in the future.**

## **ALTERNATIVE 5:**

### Rat Eradication Primarily Using Bait Pellets Containing the Rodenticide Norbormide

- ▶ **If it becomes EPA-registered, the use of EPA-approved rodenticide Norbormide, which is selective for rat species.**
- ▶ **This technology is currently under development but is not currently available for operational use in rats.**
- ▶ **If it becomes available for operational use, the analysis in the EIS will be reviewed and supplemented as necessary.**

## **OTHER EXISTING METHODS OR STRATEGIES**

The following methods and strategies are not currently considered:

- ▶ **Periodic rat population reduction**
- ▶ **Disease**
- ▶ **Trapping – on a large scale**
- ▶ **Biological control (predator introduction)**
- ▶ **Bromethalin baits**
- ▶ **Cholecalciferol baits**
- ▶ **Other first- and second-generation baits, such as warfarin, chlorophacinone, bromadiolone, difethialone, difenacoum**
- ▶ **Contraceptive baits, such as Contrapest (4-vinylcyclohexene diepoxide and triptolide) or Evolve (cottonseed oil)**





Photo: Nick Minnich | USFWS

# How to Comment

**There are several ways to provide input:**



Submit written comments in person at this meeting



Provide your comment to the Court Reporter at this meeting



Online: <https://www.regulations.gov>.  
Search for and submit comments on  
Docket No. FWS-R7-NWRS-2024-0032.



U.S. mail: Public Comments Processing,  
Attn: Docket No. FWS-R7-NWRS-2024-0032;  
U.S. Fish and Wildlife Service, MS: PRB/3W;  
5275 Leesburg Pike; Falls Church, VA 22041-3803.

**PLEASE SUBMIT ALL COMMENTS BY:  
November 7, 2024**