

APPENDIX E: DEVIATION FROM OPERATIONAL PLAN FORM, DESECHEO NWR

Requested by	David Will	Change #	1
Topic	Cliffs	Date submitted	3/16/16

Description of Change:

~~The~~ Two cliff areas will be treated at a median height ~~area~~ w/ a deflector bucket @ 17 kg/ha. The steep nature of these cliffs makes treatment by full swath difficult and bait will be shadowed and at less than target rate, resulting in gaps.

Potential EPA Label violation

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YES

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NO

If no, why not – point to the label instruction that made you conclude “NO”. If “YES”, why?

Label allows for treatment of cliffs & areas below target application rate. Sheer slope of cliffs means that deflector is sown at bottom of full swath at top leaving small amount of bait at middle of cliff. Proposed change treats a gap at the rate described for cliff faces.

Need to call USDA/EPA for consultation on label interpretation?

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YES

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NO

If “NO” why not? If “YES”, who called, when? Attach notes from discussion.

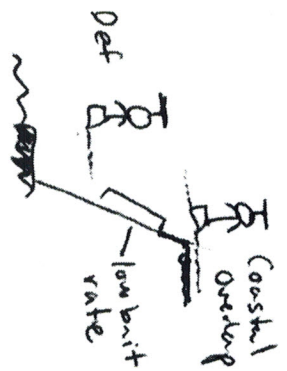
Effect on Non-target Risk, Efficacy, and Project Cost		
Non-target Risk	Efficacy	Project Cost
/	Increases efficacy by reducing areas of low application rate.	/

U.S. Fish and Wildlife Service Approval:

Name Susan Silander Signature [Signature] Position IC Date 3/17/2016

Island Conservation Approval:

Name David Will Signature [Signature] Position Operation Section Chief Date 3/16/16



Attachment Areas

- Slope Greater Than 30 Deg
- Coastal Overlap
- Cliff Faces
- Valley Floor
- Coastal Zone (Deflector)
- Interior
- Islets

