

# 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

☐

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 & 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.

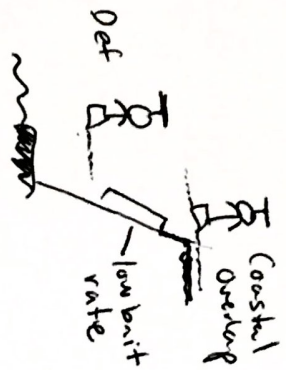
Effect on Non-target Risk, Efficacy, and Project Cost		
Non-target Risk	Efficacy	Project Cost
/	Increases efficacy by reducing areas of low application rate.	/

U.S. Fish and Wildlife Service Approval:

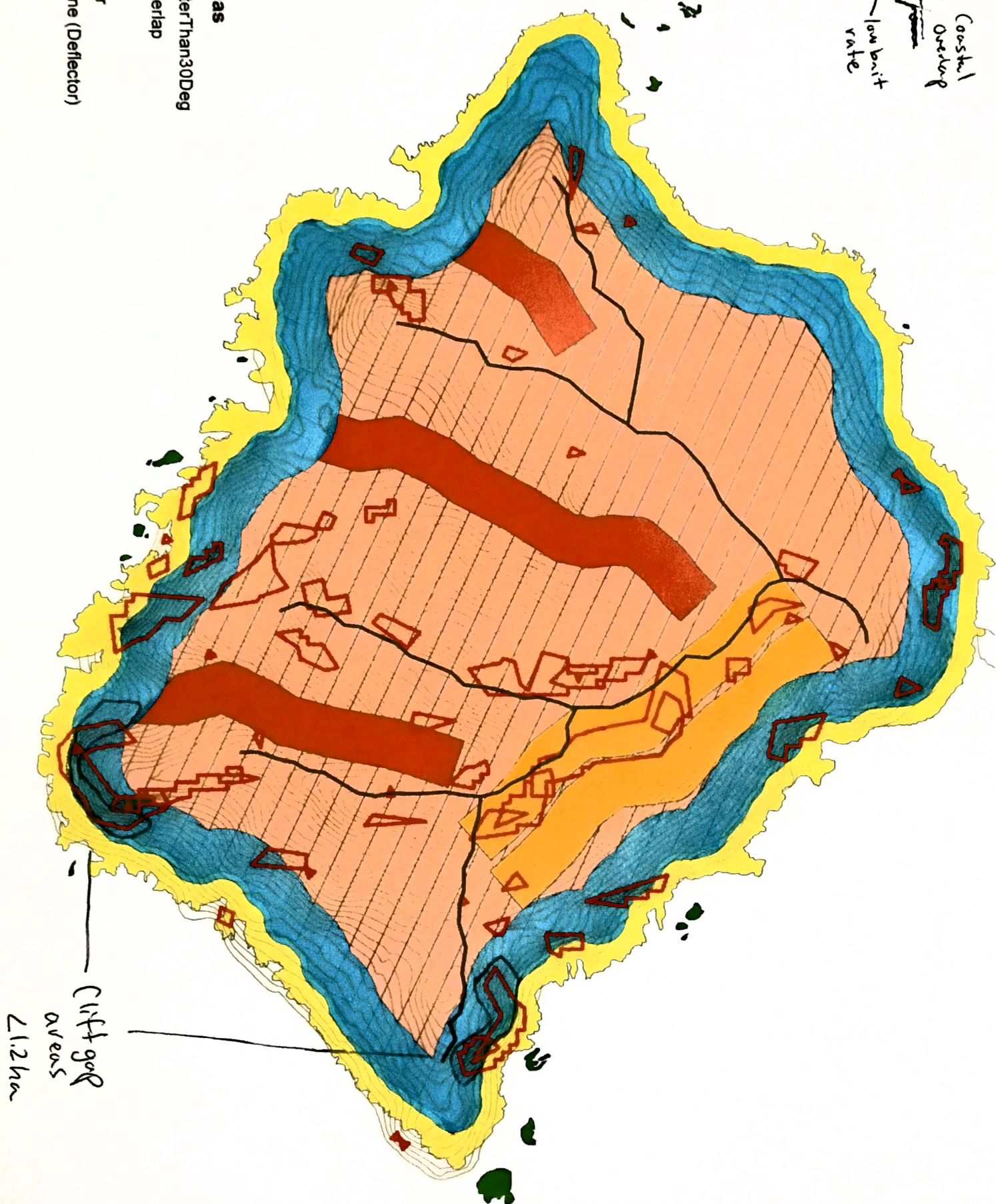
Name \_\_\_\_\_ Signature \_\_\_\_\_ Position \_\_\_\_\_ Date \_\_\_\_\_

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



Cliff gap  
areas  
21.2 ha