UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Memorandum

From: Larry Turner, Ph. D. */s/* 11-10-03
Environmental Field Branch
Field and External Affairs Division

To: Arthur-Jean Williams, Chief
Environmental Field Branch
Field and External Affairs Division

Subject: Effects Determination for Bromacil for Certain Pacific Anadromous Salmonids

I reviewed data and other information for bromacil, a registered herbicide named in a Consent Decree with the Californians for Alternatives to Toxics and allies to be evaluated for consultation with the National Marine Fisheries Service. Although the Consent Decree requires an evaluation of effects on only one Evolutionarily Significant Unit (ESU) of salmon and steelhead, I opted to evaluate all ten listed ESUs that occur in California, including the Southern Oregon/Northern California Coho Salmon ESU, which also extends into Oregon. In addition, the consent decree names only the rights-of-way uses to be analyzed. Because the information for bromacil necessary to evaluate rights-of-way also addresses other uses, I determined that it was efficient to look at all uses at one time. I looked at both bromacil and lithium bromacil active ingredients.

A Reregistration Eligibility Decision (RED) that included an environmental risk assessment was issued in August of 1996. I have adapted the more general findings of the RED to develop an analysis of the potential for effects specific to the endangered and threatened Pacific salmon and steelhead ESUs. The analysis addresses changes in uses and rates that have been put on labels since the RED was developed, along with corresponding revisions in aquatic estimated environmental concentrations and risk quotients for fish, aquatic invertebrates, and vascular aquatic plants. OPP's levels of concern are not exceeded for direct risks to endangered fish or populations of aquatic invertebrates. However, the level of concern is exceeded for risk to aquatic vascular plants from maximum applications under exceedingly conservative conditions; a more realistic and site-specific analysis cannot dismiss all of these concerns, and therefore, a potential exists for adverse effects to plants used for cover by some salmon and steelhead ESUs.

Based upon the available information, I determined that there would be no effect from the rights-of-way use of bromacil to five of the California ESUs, and that these uses may affect, but would not be likely to adversely affect the other five California ESUs. The bulk of the citrus use in California is not within salmon and steelhead ESU areas. I determined that there would be no effect from the citrus uses on nine of the California ESUs, and that the citrus use may affect, but would not be likely to adversely affect one ESU. In the absence of likely adverse effects, I am not recommending protective measures in addition to those already on the labels.

Attachments:

Bromacil and Lithium Bromacil: Analysis of Risks from Herbicide Use to Ten Evolutionarily Significant Units of Pacific Salmon and Steelhead

Reregistration Eligibility Document for Bromacil

Representative labels