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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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Memorandum

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To: Arthur-Jean Williams, Chief
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Subject: Effects Determination for Metolachlor for Pacific Anadromous Salmonids

We reviewed data and other information for metolachlor, a pesticide named by the Washington Toxics Coalition (WTC) and included in the court order for 'effects determinations' and potential consultation with the National Marine Fisheries Service. A Reregistration Eligibility Decision (RED) for metolachlor was published in April of 1995. Currently, the major uses of metolachlor are weed control in field corn, cotton, potatoes, and pod crops. We have adapted the more general findings of the RED to develop an analysis of the potential for effects on endangered and threatened Pacific salmon and steelhead Evolutionary Significant Units (ESUs) from current uses. We also have sought new information and revised aquatic estimated environmental concentrations and aquatic risk quotients for fish and vascular aquatic plants since the RED was developed. OPP's levels of concern are not exceeded for risks to aquatic animals but are exceeded for risk to aquatic plants; therefore, a potential exists for adverse affects to cover plants used by salmon and steelhead.

Based on the RED and additional considerations indicated in our analysis and other attached or referenced materials, we conclude that the use of metolachlor will have no effect on six salmon and steelhead ESUs, may affect but is not likely to adversely affect five salmon and steelhead ESUs, and may affect 15 salmon and steelhead ESUs. We have considered the phase-out of metolachlor in California in our analysis. Because use is markedly declining as existing

stocks are depleted, we believe that mitigation is not needed in the California ESUs. For the Pacific northwestern states, we propose that if OPP adopts a no-spray buffer between sites where metolachlor may be used and sites where salmon and steelhead occur, jeopardy would be avoided and take would most likely be eliminated. Alternatively, for corn and pod crops, allowing only incorporated application (currently required for preplant application but not preemergence application) would sufficiently reduce aquatic EECs that the level of concern for aquatic plants would not be exceeded.